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*Attorneys for Plaintiffs and Judgment Creditors*

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**IN THE FIFTH JUDICIAL DISTRICT COURT  
IN AND FOR WASHINGTON COUNTY, STATE OF UTAH**

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ST. LUKE’S HEALTH SYSTEM, LTD.; ST.  
LUKE’S REGIONAL MEDICAL CENTER,  
LTD.; CHRIS ROTH; NATASHA  
ERICKSON, M.D.; and TRACY  
JUNGMAN, N.P.;

Plaintiffs and Judgment Creditors,

v.

AMMON BUNDY, an individual; AMMON  
BUNDY FOR GOVERNOR, a political  
organization; DIEGO RODRIGUEZ, an  
individual; FREEDOM MAN PRESS LLC, a  
limited liability company; FREEDOM MAN  
PAC, a registered political action committee;  
and PEOPLE’S RIGHTS NETWORK, a  
political organization and an unincorporated  
association;

Defendants and Judgment Debtors.

**EX PARTE MOTION TO ENFORCE  
ORDER AND FOR SANCTIONS**

**[Hearing Requested Pursuant to Rule 7A]**

Case No. 246501034

Judge Eric A. Ludlow

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St. Luke’s Health System Ltd. (“SLHS”) and St. Luke’s Regional Medical Center, Ltd.  
 (“SLRMC,” and collectively with SLHS, “St. Luke’s”), Chris Roth (“Mr. Roth”), Dr. Natasha D.  
 Erickson (“Dr. Erickson”), and Tracy W. Jungman, NP (“NP Jungman”) (collectively “St.  
 Luke’s Parties” or “Plaintiffs” or “Judgment Creditors”), by and through their attorneys of  
 record, Holland & Hart LLP, hereby submit this Ex Parte Motion to Enforce Order and for

Sanctions against Abish-husbondi, Ammon Bundy (“Bundy”), Ammon Bundy for Governor (“Bundy Campaign”), Diego Rodriguez, Freedom Man Press, LLC, Freedom Man Pac, and Peoples Right Network (“PRN”) (collectively “Defendants” or “Judgment Debtors”).

### **INTRODUCTION**

Plaintiffs obtained a **\$51,928,306.20 judgment** and **permanent injunction** (the “Judgment”) against Defendants in Idaho state court. Plaintiffs filed a certified and exemplified copy of the Judgment on October 13, 2023, in the Third Judicial District Court, in and for Salt Lake County, State of Utah; and Plaintiffs filed another certified and exemplified copy of the Judgment on April 15, 2024, in this Fifth Judicial District Court. Consequently, the Judgment has had—and will have—the same legal force and effect as a judgment rendered in a Utah state court pursuant to the Utah Foreign Judgment Act, Utah Code § 78B-5-303.

Defendants have violated the Judgment and deserve substantial sanctions. Notwithstanding a permanent injunction against them, Defendants have repeatedly disseminated defamatory videos and statements on social media channels like YouTube, Facebook, Instagram, X (formerly known as Twitter), and other online locations. Ammon Bundy, in particular, has demonstrated utter disregard for court orders and the Judgment in this case.

Pursuant to Rule 7A of the Utah Rules of Civil Procedure, Plaintiffs respectfully request the Court order the following relief:

1. Defendants be held in contempt of court;
2. Defendants be fined \$1,000;
3. Defendants pay Plaintiffs’ reasonable costs, expenses, and attorneys’ fees caused by the violations of the Judgment and for bringing this motion; and
4. Defendants be required to appear personally at this Court on a certain date to explain whether they have violated the Judgment.

## **BACKGROUND**

This brief background summarizes the long and troubling saga involving Ammon Bundy and the Defendants' conduct, which ultimately resulted in substantial harm to the St. Luke's Parties and merited the Judgment they now seek to enforce in Utah.

### **A. Defendants**

Bundy is a conflict entrepreneur; he generates money and publicity for himself by perpetuating false conspiracies and conflicts and, in turn, marketing himself as a quasi-religious leader who valiantly opposes the same conspiracies and conflicts he is falsely perpetuating.

Bundy formed and controlled Defendant Ammon Bundy for Governor ("Bundy Campaign"). The Bundy Campaign was and is an Idaho political organization formed for the ostensible purpose of raising money to support Bundy's effort to become Governor of Idaho.

Founded and controlled by Bundy in 2020, Defendant PRN is an unincorporated association of over 60,000 members. PRN, as controlled by Bundy, acts extrajudicially and uses doxing, harassment, economic disruption, and threats of violence to harass members of the community and political enemies. Bundy uses PRN to enhance his political power, to market himself, and to solicit money. Until at least November of 2023, PRN's principal place of business was in Emmett, Idaho. Bundy actively markets and promotes PRN to grow PRN's membership, increase PRN's power to harass his enemies, and to profit from member "donations" to the entities he controls, including Abish-husbondi and Dono Custos.

### **B. Bundy Uses Sham Transactions and Sham Corporations to Conceal Assets**

As set forth in other papers, Bundy uses at least two sham corporations, Abish-husbondi and Dono Custos, to conceal his assets from creditors. Bundy exerts complete control over the entities and all decision making by the entities such that the entities operate as alter egos of

Bundy. Abish-husbondi and Dono Custos do not operate separately from Bundy, do not follow corporate formalities, and do not keep separate books.

**C. Idaho Lawsuit and Bundy's Concealment of Assets**

In March of 2022, Bundy, PRN, the Bundy Campaign and third parties to this lawsuit, Diego Rodriguez, and Diego Rodriguez's entities, Freedom Man Press, LLC and Freedom Man PAC, engaged in a conspiracy to exploit the dire medical condition of an infant to grift money from their followers, get publicity for themselves, and inflate their stature in the extremist movement. Bundy, PRN, the Bundy Campaign, and Rodriguez acted in concert to launch a knowingly dishonest smear campaign that claimed falsely that the St. Luke's Parties (along with Idaho State employees, the judiciary, the police, and Governor Little) engaged in a widespread conspiracy to kidnap, traffic, sexually abuse, and kill Idaho children from Christian families.

In furtherance of the smear campaign, they used slick marketing tactics and disinformation to launch a coordinated attack campaign of defamation and organized business disruption against the St. Luke's Parties. Systematically spreading the false conspiracy, Bundy, PRN, and Rodriguez incited their followers to disrupt medical care, threaten St. Luke's employees and patients, and harass and potentially commit acts of violence against the St. Luke's Parties.

After enduring millions in economic damages, the forced lockdowns of the St. Luke's Emergency Department in Meridian and St. Luke's campus in Boise, coordinated online disinformation campaigns, and escalating threats of violence, the St. Luke's Parties filed a defamation lawsuit against Bundy, PRN, the Bundy Campaign, and others on May 11, 2022 ("2022 Lawsuit"). In the months after the 2022 Lawsuit was filed, Bundy publicly boasted that he was transferring assets to prevent Plaintiffs from collecting on any eventual judgment.

After a two-week trial in July 2023, a jury awarded Plaintiffs a \$51,928,306.20 judgment against Bundy, PRN, the Bundy Campaign, Diego Rodriguez, and Diego Rodriguez's entities, Freedom Man Press, LLC, and Freedom Man PAC. The Judgment – including its comprehensive Permanent Injunction based on findings of fact from the trial – was entered by the court on August 29, 2023.

True to his boast, during the course of the 2022 Lawsuit, Bundy wrongfully concealed and dissipated millions in assets. And, since the court there entered a Default Judgment and Permanent Injunction in the 2022 Lawsuit, Bundy, on behalf of himself, PRN, and the Bundy Campaign, has reiterated in public postings that he contends he “owes nothing” to the St. Luke's Parties and will not willingly pay the jury award. True to form, even after entry of the Judgment, Bundy continued to take steps to wrongfully conceal and dissipate assets to frustrate the St. Luke's Parties' efforts to collect, including orchestrating the fraudulent transfer of a principal asset—his primary residence in Idaho.

**D. Bundys Move to Utah**

Sometime on or around November 13, 2023, Ammon and Lisa Bundy abandoned their primary residence and fled Idaho. They are currently living near Cedar City.

**ARGUMENT**

Rule 7A of the Utah Rules of Civil Procedure allow parties to “enforce a court order or to obtain a sanctions order for violation of an order,” which is the relief that Plaintiffs request in this Motion. Utah R. Civ. P. 7A(a). Plaintiffs' Motion “must be accompanied by at least one supporting affidavit or declaration that is based on personal knowledge and shows that the affiant or declarant is competent to testify on the matters set forth.” Utah R. Civ. P. 7A(b). Such affidavit or declaration “must set forth facts that would be admissible in evidence and that would support a finding that the party has violated the order.” *Id.* The Motion must also be

accompanied by a proposed order, which is filed contemporaneously herewith. Utah R. Civ. P. 7A(c).

The Judgment is clear: Bundy and the Defendants must cease disseminating defamatory statements against Plaintiffs. *See* Declaration of Anne Henderson Haws (“Haws Decl.”), ¶¶ 8-9, attached as **Exhibit 1**. And the evidence is clear: Bundy and the Defendants have repeatedly and egregiously violated the Judgment since its entry and have shown no signs they intend to stop their conduct. Haws Decl., ¶¶ 10-14.

Among other things, Defendants must cease posting and disseminating defamatory statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and or killing of children—and they must remove all such content from all online locations or websites, including but not limited to Facebook, YouTube, and X (formerly known as Twitter). *See* Haws Decl., Ex. B, ¶ 8.b.-c. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs including that:

- (i) the Infant was perfectly healthy when taken by Child Protective Services;
- (ii) St. Luke’s made the Infant sick and infected the Infant with disease;
- (iii) the Infant was kidnapped or unlawfully taken by law enforcement or St. Luke’s;
- (iv) St. Luke’s, St. Luke’s management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money;
- (v) the medical providers are pedophiles who want to abuse children and engage in child trafficking;
- (vi) Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services Custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with specific sexual orientation to adopt children;
- (vii) St. Luke’s and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant;
- (viii) St. Luke’s reported the parents to Child Protective Services;

- (ix) Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022;
- (x) St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated;
- (xi) the family was discriminated against because the Infant was not vaccinated;
- (xii) the parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider;
- (xiii) the parents did not consent to the medical treatment provided to the Infant; and
- (xiv) the Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protestors' or Defendants' actions.

*Id.*

Further, Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman—and they must remove such content from all online locations or websites. *See* Haws Decl., Ex. B, ¶ 8.d.-f. Defendants must also deactivate links to defamatory statements or statements that invade the privacy of the St. Luke's Parties by portraying them in a false light.

*Id.*

Since the Judgment was entered on August 29, 2023, Defendants—and Ammon Bundy, in particular—have repeatedly violated the above terms of the permanent injunction. *See* Haws Decl., ¶¶ 10-14. As demonstrated in the supporting declaration, Defendants have continued to post and disseminate defamatory videos and statements on YouTube, Facebook, Instagram, X (formerly known as Twitter), [www.spreaker.com](http://www.spreaker.com), <https://rumble.com>, and other online locations.<sup>1</sup> *Id.* Plaintiffs have provided the Court with a detailed spreadsheet tracking each

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<sup>1</sup> To remove offending content, Plaintiffs—and not Defendants as ordered by the Court—have sought and obtained “take down” orders to YouTube, but much of the content remains online with YouTube and other forums. Indeed, Defendants have often reposted videos/statements even after they have been removed.

violation of the Judgment. *Id.* The native spreadsheet has hyperlinks wherein the Court can immediately click to view or hear the offending videos/statements. *Id.*

Here are just a few examples of Defendants' conduct:

- On September 13, 2023, Ammon Bundy posted on X a statement and video: "Will They Kill to Silence? Is this Really about Defamation? Damning evidence that Idaho CPS, Meridian Police and St. Luke's Hospital wrongfully took a baby and will stop at nothing to silence. Check this video for more evidence. They even lied to the jury!" (<https://twitter.com/RealABundy/status/1702187197741334757>)

In the 25-minute video, Bundy claims that "St. Luke's executives will go as far as having Diego and I killed to silence us" and doubles down on the same false and defamatory statements that resulted in the Judgment and permanent injunction against him.

- On December 4, 2023, Ammon Bundy posted on X a statement and video: "St. Luke's Health System took my home. Who are they and what does that mean for Idahoans? #idpol #idleg #savebabycyrus #takecareofmaya." (<https://twitter.com/RealABundy/status/1731783290816745769>)

In the 13-minute video, Bundy claims "St. Luke's ultimately instigated the taking of baby of Cyrus."

- On December 22, 2023, Ammon Bundy posted on X a statement and link to a website with the first line: "Because Ammon Bundy helped expose the medical kidnapping of Baby Cyrus he is being sued by a humungous healthcare conglomerate for tens of millions of dollars." (<https://twitter.com/RealABundy/status/1738414694413590567>)

The website also posts photographs of Mr. Roth and other St. Luke's executives.

- On January 6, 2024, Ammon Bundy posted on X a statement and video. In the 12-minute video, Bundy claims that St. Luke's "participated in taking baby Cyrus from his loving and caring parents." (<https://twitter.com/RealABundy/status/1743868545405001854>)
- On January 8, 2024, Ammon Bundy posted on X a statement and video. In the 14-minute video, Bundy claims that "baby Cyrus was neglected by St. Luke's staff" and St. Luke's staff "met the conditions of child abuse in Idaho" and "put Cyrus in imminent danger of death for several days." (<https://twitter.com/RealABundy/status/1744424938373558378>)
- On February 17, 2024, Ammon Bundy posted a YouTube video with the title "They took a baby from loving parents because they missed one doctor's appointment." In



the 4-minute video, Bundy claims that St. Luke's was "misdiagnosing the child and barring his parents from seeing him."

(<https://www.youtube.com/watch?v=t5HDyVIMMiA>)

- On March 3, 2024, Bundy posted a YouTube video with the title "I will give you \$10,000 cash!" In the 3-minute video, Bundy claims he will pay someone \$10,000 if they find even one small lie that he has said about the Plaintiffs. He posts photographs of Mr. Roth, Dr. Erickson, and NP Jungman.  
(<https://www.youtube.com/watch?v=Pa6U78z5FTA&t=1s>)

See Haws Decl., Ex. B, ¶¶ 10-14.

At every turn, Bundy and the Defendants have flouted the Judgment and the authority of the Court. Accordingly, this Court should enter sanctions against Defendants and require them to appear to account for their ongoing and egregious violations.

### **CONCLUSION**

Based on the foregoing, Plaintiffs move the Court to enter the following order:

1. Defendants should be held in contempt of court;
2. Defendants should be fined \$1,000;
3. Defendants pay Plaintiffs' reasonable costs, expenses, and attorneys' fees caused by the violations of the Judgment and for bringing this motion; and
4. Defendants be required to appear personally at this Court on a certain date to explain whether they have violated the Judgment.

DATED this 22nd day of April, 2024.

HOLLAND & HART LLP

/s/ Darren G. Reid

Darren G. Reid

*Attorneys for Plaintiffs and Judgment Creditors*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2024, I caused to be electronically filed the foregoing  
**MOTION TO ENFORCE AND ENTER SANCTIONS** with the Clerk of the Court using the  
GreenFiling system.

/s/ Christa L. Fries

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**IN THE FIFTH JUDICIAL DISTRICT COURT  
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ST. LUKE'S HEALTH SYSTEM, LTD.; ST.  
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LTD.; CHRIS ROTH; NATASHA  
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AMMON BUNDY, an individual; AMMON  
BUNDY FOR GOVERNOR, a political  
organization; DIEGO RODRIGUEZ, an  
individual; FREEDOM MAN PRESS LLC, a  
limited liability company; FREEDOM MAN  
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and PEOPLE'S RIGHTS NETWORK, a  
political organization and an unincorporated  
association;

Defendants and Judgment Debtors.

**DECLARATION OF ANNE  
HENDERSON HAWS IN SUPPORT OF  
MOTION TO ENFORCE ORDER AND  
FOR SANCTIONS**

Case No. 246501034

Judge Eric A. Ludlow

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I, Anne Henderson Haws, testify and certify to the following:

1. I am over the age of 18 years and counsel of record for Plaintiffs ("St. Luke's Parties") in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

**EXHIBIT**

**1**

### **The Idaho Lawsuit & Judgment**

2. I also served as counsel of record in *St. Luke's Health Systems, Ltd., et al. v. Ammon Bundy, et al.*, Case No. CV01-22-06789, Fourth Judicial District, State of Idaho, County of Ada ("2022 Lawsuit"), and have personal knowledge of matters pertaining thereto.

3. The District Court in the 2022 Lawsuit entered Findings of Fact, Conclusions of Law and Order for Permanent Injunctive Relief for Plaintiffs on August 25, 2023 ("Findings, Conclusions, and Order"). A true and correct copy of the Findings, Conclusions, and Order) is attached hereto as **Exhibit A**.

4. As set forth in the District Court's Findings, Conclusions, and Order, during March of 2022, Ammon Bundy, PRN, the Bundy Campaign and others (herein "Defamation Defendants") engaged in a grift, recklessly exploiting the dire medical condition of an Infant to gain money and publicity for themselves. Seeking to benefit financially, to enhance their standing among their followers, and to grow the membership of and revenues from PRN, Bundy acted in concert with the others to launch a knowingly dishonest smear campaign that claimed Idaho State employees, the judiciary, the police, primary care providers, and the St. Luke's Parties engaged in widespread kidnapping, trafficking, sexual abuse, and killing of Idaho children. *See Exhibit A*, ¶¶ 1; 39-41; 56-66; 70-78; 81; 84.

5. As set forth in the District Court's Findings, Conclusions, and Order, in furtherance of their smear campaign, Bundy, PRN, and the other Defamation Defendants used marketing tactics and disinformation to launch a coordinated attack campaign of defamation and organized business disruption against the St. Luke's Parties. Bundy incited and agitated their followers with false conspiracy theories of the kidnapping, trafficking, sexual abuse, and killing of children purposefully creating the risk that their followers would threaten or actually commit acts of violence against the St. Luke's Parties. *See Exhibit A*, ¶¶ 1; 39-41; 56-66; 70-78; 81; 84.

6. As set forth in the District Court's Findings, Conclusions, and Order, Bundy and the Defamation Defendants controlled and coordinated the wrongful attacks to further a number of improper objectives, including (1) to harm the St. Luke's Parties, (2) to subvert the authority and rulings of the judiciary through disinformation and harassment, (3) to mislead and manipulate their followers, (4) to enhance their political reputations and personal brands, (5) to grow membership in the PRN, (6) to drive traffic to websites for PRN and the Bundy Campaign, (7) to benefit Bundy financially through financial contributions, donations, and fees paid to the Bundy Campaign, PRN, his sham corporations Abish-husbondi, Inc. and Dono Custos, Inc., and Diego Rodriguez's entities Freedom Tabernacle Incorporated, Power Marketing Agency, LLC and Power Marketing Consultants LLC. *See Exhibit A*, ¶¶ 56-66; 85-90.

7. As set forth in the District Court's Findings, Conclusions, and Order, the wrongful actions of Bundy, PRN, and Defamation Defendants caused millions in economic damages. Bundy, PRN, and Defamation Defendants the forced lockdowns of the St. Luke's Emergency Department in Meridian and St. Luke's hospital campus in Boise, coordinated online disinformation campaigns, and systematically spread false conspiracy which lead to escalating risks of violence against the St. Luke's Parties. *See Exhibit A*, ¶¶ 67-69; 85-90.

8. After default proceedings and a two-week long damages trial, a jury found Defendants Ammon Bundy, PRN, Bundy for Governor, Diego Rodriguez, and Diego Rodriguez's entities, Freedom Man Press, LLC, and Freedom Man PAC jointly and severally liable to the St. Luke's Parties in the amount of \$51,928.306.20. A true and correct copy of the Default Judgment entered in the 2022 Lawsuit is attached hereto as **Exhibit B**.

9. In addition to the jury verdict, the District Court in the 2022 Lawsuit issued a Permanent Injunction based on extensive findings of fact and conclusions of law. *See*

**Exhibit A.**

10. Since the Judgment was entered on August 29, 2023, Defamation Defendants have repeatedly violated the terms of the Judgment.

11. Defamation Defendants have continued to post and disseminate defamatory videos and statements on YouTube, Facebook, Instagram, X (formerly known as Twitter), [www.spreaker.com](http://www.spreaker.com), <https://rumble.com>, and other online locations.

12. Attached herewith is a true and correct copy of a detailed spreadsheet prepared by Holland & Hart tracking each violation of the Judgment (**Exhibit C**, native version provided directly to the Court). The native spreadsheet provided to the Court has hyperlinks wherein the Court can immediately click to view or hear the offending videos/statements.

13. To remove offending content, Plaintiffs—and not Defendants as ordered by the Court—have sought and obtained “take down” orders to YouTube, but much of the content remains online with YouTube and other forums. Indeed, Defendants have often reposted videos/statements even after they have been removed. The spreadsheet informs the Court if offending content has been removed by YouTube or another forum.

14. Here are just a few examples of Defendants’ conduct that violates the Judgment: *See Exhibit C* at E59, E78, E82, E85, E87, B48, and B51.

- On September 13, 2023, Ammon Bundy posted on X a statement and video: “Will They Kill to Silence? Is this Really about Defamation? Damning evidence that Idaho CPS, Meridian Police and St. Luke’s Hospital wrongfully took a baby and will stop at nothing to silence. Check this video for more evidence. They even lied to the jury!” (<https://twitter.com/RealABundy/status/1702187197741334757>)

In the 25-minute video, Bundy claims that “St. Luke’s executives will go as far as having Diego and I killed to silence us” and doubles down on the same false and

defamatory statements that resulted in the Judgment and permanent injunction against him.

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(<https://twitter.com/RealABundy/status/1738414694413590567>)

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(<https://www.youtube.com/watch?v=Pa6U78z5FTA&t=1s>)

15. Bundy has undertaken efforts to prevent service throughout the Idaho state court proceedings. When he left Idaho, he failed to provide St. Luke’s Parties or the courts where actions are pending against him (Idaho’s First District Court, Ada County; Idaho’s Third District

Court, Gem County; and the U.S. District Court for the District of Idaho) with an update to his mailing address. As such, the best way to serve Bundy is his email address, [aebundy@bundyfarms.com](mailto:aebundy@bundyfarms.com), and P.O. Box 1062 Cedar City, Utah 84712, which is where I understand Bundy is or has received mail for rent payments to Abish-husbondi related to property it holds in Emmett, Idaho. Use of Bundy's email address and this Cedar City address are also likely the most efficacious way to serve Defendants and Judgment Debtors PRN and Ammon Bundy for Governor.

I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

DATED this 22nd day of April, 2024.

By: /s/ Anne Henderson Haws  
Anne Henderson Haws



IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF

THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

ST. LUKE'S HEALTH SYSTEM, LTD; ST.  
LUKE'S REGIONAL MEDICAL CENTER,  
LTD; CHRIS ROTH, an individual;  
NATASHA D. ERICKSON, MD, an  
individual; and TRACY W. JUNGMAN, NP,  
an individual,

Plaintiff(s),

-VS-

AMMON BUNDY, an individual; AMMON  
BUNDY FOR GOVERNOR, a political  
organization; DIEGO RODRIGUEZ, an  
individual; FREEDOM MAN PRESS LLC, a  
limited liability company; FREEDOM MAN  
PAC, a registered political action committee;  
and PEOPLE'S RIGHTS NETWORK, a  
political organization and an unincorporated  
association,

Defendant(s).

Case No. CV01-22-6789

FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER FOR PERMANENT  
INJUNCTIVE RELIEF FOR  
PLAINTIFFS

In Plaintiffs' Fourth Amended Complaint, Plaintiffs sought injunctive relief in addition to any damages awarded by the jury. The Defendants were allowed to participate in the jury trial on damages including jury selection, opening statements, cross-examination and closing arguments, but all Defendants failed to appear. After seven days of trial on the issue of damages, the jury awarded the Plaintiffs certain monetary relief on their claims. The equitable relief in the form of injunctive relief was not before the jury as injunctive relief is for the Court to decide.

**EXHIBIT**

**A**

Having reviewed the docket, the admitted facts in the Fourth Amended Complaint due to the Defendants' default in this lawsuit, and being informed by both the evidence presented in the trial on monetary damages as well as the jury's verdicts on the Special Verdict Form, the Court issues its Findings of Fact and Conclusions of Law on the request for permanent injunctive relief.

### **Findings of Fact**

These findings of fact are primarily based on the live testimony and exhibits presented at the jury trial on damages. The exhibits are extensive and set forth the specific "statements" of the Defendants through videos, internet postings, publications, etc. The statements speak for themselves as to who made or published the statement. The statements and publications are too numerous to repeat in this case, but each exhibit was testified to in Court and only the admitted exhibits were relied on by the Court.

The testimony on the underlying events as well as care of the C.A. (the "Infant") were relevant at trial to provide background and context regarding the conduct of the Defendants. These findings of fact are supported by the substantial and competent evidence provided by credible witnesses and exhibits admitted during the trial. The Court will generally refer to the nature of statements and the contents of the statements without citing all the exhibits to support each finding of fact. All exhibits admitted are part of the Court record in this matter.

1. The Plaintiffs brought this action in response to the Defendants' statements and publications made against the named Plaintiffs, the trespass that occurred on

St. Luke's<sup>1</sup> hospitals in Meridian and Boise. The events that started the interactions between Plaintiffs and Defendants centered on the medical care of the Infant.

2. Nurse Practitioner Nadia Kravchuk, the Infant's primary care provider (PCP) saw the ten month old Infant on or about March 1, 2022. The Infant was severely dehydrated and the parents said the baby was vomiting. The Infant had lost approximately 4 pounds since its six-month wellness visit. NP Kravchuk's office was unable to provide the necessary care and IV to rehydrate the Infant in her office. The parents were directed to the St. Luke's Boise Hospital emergency room where the Infant could be rehydrated.
3. The Emergency Room (ER) doctor on duty at St. Luke's determined not only was the Infant severely dehydrated, but the Infant was suffering from severe malnutrition. The ER doctor consulted with the Pediatric Hospitalist on duty, Dr. Erickson, who agreed the Infant should be admitted. Dr. Erickson agreed with the ER doctor's diagnosis of severe malnutrition and dehydration. Dr. Erickson testified the condition of the Infant was dire and without proper medical intervention, the Infant was at risk organ failure and possible death. This was NOT a healthy baby when it arrived at the hospital on March 1, 2022. The parents reported to Dr. Erickson that the Infant was doing well until about 7 months of age and then reoccurring vomiting started and such vomiting would continue for several days. *See*, Exhibit 1, page 12.
4. Dr. Erickson is Board-Certified in both General Pediatrics and Pediatrics Hospital Medicine. She a highly trained pediatric doctor. Dr. Erickson consulted with the parents regarding the condition of the Infant. The parents agreed to the care plan to rehydrate

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<sup>1</sup> The Court will prefer to Plaintiffs St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center Ltd. Collectively as "St. Luke's."



and increase caloric intake for the Infant recommended by Dr. Erickson. At no time did Dr. Erickson threaten the parents to call child support enforcement if the parents did not agree to the treatment plan.

5. The parents did not want the Infant vaccinated. No medical provider vaccinated the Infant and that preference of the parents was respected. There was testimony by Dr. Erickson and NP Jungman, the parents' decision not to vaccinate the Infant did not in any way impact the care plan for the Infant or the respect shown the parents.
6. Prior treatment medical records for the Infant's medical care since birth were not provided by the parents and could not be obtained by Dr. Erickson beyond NP Kravchuk's limited records. This led to some additional tests being run to rule out other potential causes for the Infant's condition. Dr. Erickson noted the Infant was failing to thrive.
7. With proper medical intervention and treatment, including IVs to rehydrate, bottle feedings as well as additional feedings through a nasogastric feeding tube (NG tube), the Infant's medical condition improved.
8. Dr. Erickson arranged for St. Luke's staff and social worker to assist parents apply for and receive Medicaid so there would be no out-of-pocket cost to the family for the Infant's care. The family had no medical bills that were not paid by Medicaid for the Infant's care.
9. Dr. Erickson also arranged for a home health nurse to come to the Infant's home to check on the progress of the child and to help with any further needs for the child and family members caring for the child. Dr. Erickson explained, and the parents seemed to understand, that continuing the additional caloric intake was critical as the feeding

plan being used prior to the hospitalization was insufficient to allow the Infant to grow and thrive. Regular weight check-ins were also critical for determining if the Infant was or was not continuing with gaining weight as he had done in the hospital. The parents were trained on how to complete additional feedings via the NG tube. The parents were also advised to continue breast-feeding the Infant in addition to the other necessary feedings.

10. On March 4, 2022, the Infant's medical condition had improved to where the Infant could be cared for at home and the Infant was released to the parents with discharge instructions and verbal commitments by the parents they would comply with the instructions and call if they had questions or needed any further assistance.
11. The parents did not follow the discharge instructions for care for the Infant. Nor would the parents allow the home health nurse to come to their home to check on the Infant on March 5, 2022 or March 6, 2022.
12. Finally, on March 7, 2022, the parents took the Infant to NP Dkystra (who was not a St. Luke's medical provider but who St. Luke's had connected the family with as he would be able to assist with the NG tube and NP Kravchuk indicated she was not able to provide that level of care for the Infant). At this appointment, the Infant's weight had dropped since it was released from the hospital. NP Dkystra advised the parents how to increase caloric intake and set another appointment for March 11, 2022 to check the Infant's weight.
13. On March 11, 2022, the parents missed bringing the Infant to the scheduled appointment.

14. On March 11, 2022, NP Aaron Dkystra (not any doctor, NP or staff member of St. Luke's) called Department of Health and Welfare Child Protection Services (CPS) regarding his concern about the Infant and requesting a check on the child to make sure the weight of the Infant was not continuing to drop and thus endangering the Infant's life. NP Dkystra had a statutory duty to report his concerns regarding medical neglect by the Infant's parents.
15. A Department of Health and Welfare (DHW) Safety Assessor was assigned to the case. She also made contact with NP Jungman and law enforcement who regularly assist with investigation and welfare checks on children.
16. Going into a weekend, the need to have the Infant's status checked became a greater concern for the Infant's well-being. The DHW Safety Assessor came to Ms. Jungman's office to discuss the referral regarding the Infant. NP Jungman reviewed limited medical records. The DHW Safety Assessor could not reach the Infant's parents. NP Jungman said she would stay at work to see the Infant if parents would bring the Infant in.
17. NP Jungman has been a nurse or nurse practitioner for over 24 years. She is highly skilled based on her studies and work experience. She specializes her practice in providing clinical care and evaluation of children. She has also been trained in and has extensive experience in CPS process.
18. On March 12, 2022, the parents called and indicated they would take the child to St. Luke's Children at Risk Evaluation Services (commonly referred to by its acronym CARES unit) for a weigh-in and wellness check at 4:00 p.m. The parents never arrived for the appointment.



19. Detective Fuller of the Meridian Police Department consulted with Nurse Practitioner Jungman at CARES about what to look for when they were able to put eyes on the Infant to determine if the Infant was or was not doing well. Detective Fuller is experienced at CPS investigations and is trained in the legal standard necessary to remove a child from his or her parents' care.
20. Law enforcement attempted contact with the parents to check on the Infant at the home address provided. Defendant Rodriguez answered the door and would not let law enforcement check on the child.
21. Later that evening, law enforcement was able to track parents down in a vehicle and initiated a traffic stop to investigate the CPS referral and check on the Infant's welfare.
22. Defendants had communicated with their followers and had a large number of persons arrive at the gas station where the traffic stop occurred.
23. With the Infant being held by its mother, Detective Fuller did a welfare check on the child. The NG tube was no longer in place. The Infant presented with symptoms and observations indicating it was not doing well and was in imminent danger. The Infant and his mother were taken to the ambulance.
24. In the ambulance, the Infant was removed from the mother due to Detective Fuller's determination the Infant was in imminent danger. Detective Fuller completed the paperwork to take the Infant into the custody of DHW and to get the Infant transported to the nearest ER.
25. The Emergency Medical Technicians at the scene determined the Infant was "medically stable to transport." "Medically stable to transport" status is not the same as a patient

being medically stable and healthy and in no need of further medical care. It is simply a determination it is safe to transport the patient in the ambulance to the hospital.

26. The Infant was transported to the closest hospital, St. Luke's Meridian hospital, by ambulance.

27. At the ER, Dr. Rachel Thomas examined the Infant. She is a Board-Certified Emergency Room doctor who also has extensive medical experience and training involving children, including treatment of malnutrition and dehydration. Dr. Thomas also determined the Infant was in imminent danger/harm and needed a higher level of care that could be provided at the St. Luke's Children's Hospital at the main St. Luke's hospital in Boise.

28. Even after a bottle feeding in the ER in which the Infant gulped down 6 ounces of formula, Dr. Thomas noted the Infant's weight was less than the weight when the Infant left the St. Luke's Children's Hospital on March 4, 2022. Dr. Thomas diagnosed the Infant with severe malnutrition and dehydration that could lead to death if not immediately addressed.

29. Dr. Thomas testified that the defamatory statements and postings about her by the Defendants have led to emotional stress such that she is taking a break from medicine and leaving the community with her family for an extended period of time. It is her hope she will be able to return and actively continue her medical career.

30. Defendant Bundy arrived at St. Luke's Meridian and with others blocked the ambulance bay from other ambulances being able to come to the hospital. Bundy was demanding release of the Infant even though he was not a family member or guardian of the Infant.



31. The protesters grew in number. The Meridian Police were called. The access doors to the ambulance bay were locked. Bundy was eventually trespassed from the private property of St. Luke's and was arrested along with another person engaged in the protests in the ambulance bay.
32. With active protesting occurring at the ER, Dr. Thomas consulted with hospital security and the Meridian Police Department and had the Infant safely transported to the Children's Hospital after determining the Infant was medically stable to be transported.
33. Dr. Thomas called Dr. Erickson and asked to have the Infant admitted. Dr. Erickson agreed to the admission and immediately went to the hospital to assist with the admission of the Infant to St. Luke's Children's Hospital and to begin further treatment.
34. Even though the Infant was in the custody of the DHW, St. Luke's medical professionals informed the parents of the care plan and the parents consented to all treatment provided by Dr. Erickson as well as by the other Pediatric Hospitalists caring for the Infant.
35. Dr. Erickson confirmed the Infant had in fact lost significant weight<sup>2</sup> since its release on March 5, 2022. Another NG tube was placed, and feedings and hydration began on the Infant.
36. Other Pediatric Hospitalists also provided care for the Infant when Dr. Erickson was not on duty.

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<sup>2</sup> It is important to note that while the amounts of weight loss or gain in this case may not "sound" significant, for the age and size of the Infant in this case and where the Infant was measured at being on the growth chart (in lower than 0.5% of all infants this age), the weight loss was significant and could lead to organ failure and death.

37. NP Jungman also consulted with the Pediatric Hospitalists and participated in the phone and in-person communications with the parents during the time the Infant was at the Children's Hospital. She also stayed involved in the care when the Infant was released to DHW's caregiver.

38. The parents were regularly updated by St. Luke's employees about the Infant's status and were allowed to visit and hold the Infant for approximately two hours at the hospital on or about March 13, 2022. Other visits and communications also occurred while the Infant was at the Children's Hospital.

39. While the Infant was being treated at the Children's Hospital, the Defendants Bundy and Rodriguez, in conjunction with multiple communications sent out by the other Defendants, organized protestors at St. Luke's Boise Hospital. The protests involved hundreds of people including people armed with weapons. Defendant Rodriguez made statements on March 14, 2022 that the Infant was being abused and mistreated by St. Luke's.

40. On March 12, 2022, the Defendants and followers of the Defendants were instructed by Bundy, Rodriguez and the websites or communications from People's Rights Network (PRN) and Freedom Man Press LLC to disrupt the operations of the St. Luke's by jamming the phone lines complaining and demanding the release of the Infant.

41. Bundy and Rodriguez would not leave the private property of St. Luke's when asked. Boise Police and Idaho State Troopers were brought in to maintain the security of the hospital.

42. Eventually, the threat of risk of harm to patients, patients' families, employees and a breach of the hospital became too great and the hospital was forced into lockdown and to close the hospital to new patients.
43. Armed protesters and followers of the Defendants attempted to enter the hospital even after it was locked down.
44. After it was discovered that the Infant had been removed from the hospital, the protesters moved their demonstrations to DHW offices.
45. The Infant was doing better and was discharged from St. Luke's on March 15, 2022 to DHW custody. The parents were allowed more and more time with the Infant by DHW as part of the safety/reunification plan.
46. Through intensive medical efforts, the Infant began gaining weight and his risk of imminent harm was eliminated. The Infant required ongoing monitoring to make sure it was continuing to gain weight and thrive. Additional calories were being given via the NG tube by the Infant's caregivers.
47. DHW stayed in regular communication with CARES and the parents regarding care of the Infant. NP Jungman along with the Medical Director of CARES evaluated the Infant 3-4 times and the Infant was gaining weight.
48. On March 18, 2022, the parents called DHW as the feeding tube had inadvertently come out while the parents had care of the Infant as part of DHW's safety/reunification plan. The parents did not want to go to hospital or have the Infant seen at their home. The parents requested NP Jungman reinstall the NG tube. DHW arranged a place and time to meet the parents away from protesters who were at the main DHW office. NP



Jungman reinstalled the NG tube in the Infant, following applicable standards of care for such a procedure.

49. NP Jungman and the CARES Medical Director evaluated the Infant again on March 23, 2022 with the parents present. The follow-up weight check showed the Infant was continuing to progress. The Infant was more interactive than at previous visits. Home health and PCP care was discussed again with parents.

50. Dr. Michael Whelan, a Board-Certified Pediatrician who works at St. Alphonsus, testified he concurred in the diagnosis and all of the care provided to the Infant. He confirmed based on the medical records that the Infant was in imminent danger based on its dehydration and malnutrition and the Infant was failing to thrive. He further opined that all care provided met the standard of care and there was no medical malpractice or misdiagnoses by any medical practitioner and specifically not by either of the named plaintiffs, Dr. Erickson and NP Jungman. He opined the NG tube was necessary and appropriate both times at the hospital. He opined the discharge instructions from St. Luke's were appropriate. He opined the re-installation of the NG tube by NP Jungman was within the standard of care and did not cause any infection or disease to the Infant as the placement of the tube was into a non-sterilized location of the body, the stomach. He opined the re-installation of the HG tube did not cause an infection in the Infant.

51. Dr. Whelan also opined the parents of the Infant were "medically neglectful" for not following through on discharge instructions and with follow up visits for weight checks to make sure feedings were providing the Infant with sufficient caloric intake. Dr.

Whelan opined he believed the parents knew the Infant had lost weight after first time Infant was released from hospital on March 4, 2022.

52. Dr. Whelan opined that, based on all the outside pressure by Defendants, St. Luke's, Dr. Erickson and NP Jungman performed very well and there was no evidence that the Infant was not improving while in the care of St. Luke's.

53. Based on the testimony of Kyle Bringham, the Ada County Deputy Prosecutor who handled the Infant's case and has 8-9 years of experience involving CPS cases, the CPS proceedings and requisite findings for placement into DHW custody occurred as required by statute. A shelter hearing was held on March 15, 2022 and a mandatory adjudicative hearing was set. A Notice of Dismissal by the State was filed on or about May 4, 2022, so the adjudicatory hearing set for May was vacated. The Infant was returned to the custody of the parents with a safety plan.

54. David Jeppesen, Director of the Department of Health and Welfare, also testified the CPS process is defined by statute and was followed in this case. The courts, not the DHW, decide if a child is allowed to return to his or her parents. The goal is to reunite children with their parents and this goal in Idaho is achieved in about 65% of the CPS cases (which is much higher than the national average).

55. Director Jeppesen also testified the DHW does not get "extra money" for placing a child in the care of DHW per the CPS statute. The legislature sets the budget for the DHW and there is no increase in monies to the DHW for children taken into temporary custody under the CPS. Director Jeppesen also testified that allegations of child trafficking or kidnapping are untrue. While there are some adoptions of children whose parents are not fit to raise them, this is in accordance with Idaho's statutes and court

approval is required for all such adoptions. Finally, such adoptions do not happen frequently and there is no preference for persons of a particular sexual orientation as alleged by Defendants.

56. Immediately after the CPS referral was made and the Infant was removed from the parents, the Defendants Bundy and Rodriguez, through their own statements, video postings, communications with their followers and their internet postings on the websites of the other Defendants: Peoples Rights Network (PRN), Freedom Man Press, LLC and Ammon Bundy for Governor -- which Bundy and/or Rodriguez controlled-- began doxxing<sup>3</sup> and intimidating the Plaintiffs, other medical providers as well as anyone involved in the CPS matter (including but not limited to law enforcement, the prosecuting attorney, the judge handling the confidential CPS court proceedings, and the Safety Assessor for DHW).

57. Defendants' statements were intended to damage the reputations of the Plaintiffs; invade the privacy of Mr. Roth, Dr. Erickson, and NP Jungman; to shut down St. Luke's Hospital; and to threaten harm to those involved in the CPS case involving the Infant.

58. Defendants Bundy and Rodriguez are actively involved in and are spokespersons for PRN. Defendant Rodriguez controls and authors many of the statements posted on Defendant Freedom Man Press, LLC's website, which published Bundy and Rodriguez's defamatory statements on the internet and on other extremist media outlets. Bundy and Rodriguez hold themselves out to be anti-government activists motivated by certain religious beliefs. Bundy encourages militia-style training for his

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<sup>3</sup> Doxxing includes publicly identifying or publishing private information about a person as a form of punishment or revenge.



followers. He urges his followers to take action outside the law to protect their rights. Defendants Bundy and Rodriguez, PRN and Freedom Man Press, LLC are willing to encourage others to join them in using violence to reach their objectives and to harass public employees such as law enforcement, DHW employees, CPS prosecutors, and judges.

59. Bundy and Rodriguez used the tactic of “public shaming” through false and defamatory narratives to intimidate and defame the Plaintiffs. This included but was not limited to accusing the Plaintiffs to be involved in kidnapping, child trafficking, child abduction, abusing children, and stealing children for money and pedophilia. This intimidation also included releasing private information about Mr. Roth, Dr. Erickson and NP Jungman which put these Plaintiffs and their families at risk of harm as testified to at trial.

60. PRN was a supporter of Ammon Bundy for Governor, and the events in this case were the topic of Bundy at political gatherings, and defamatory statements about Plaintiffs were made by Bundy at his political events and made for the indirect purpose of raising campaign contributions.

61. Spencer Forby, an expert on extremist organizations as well as a highly trained law enforcement officer and instructor on de-escalating situations, crowd control and SWAT techniques, opined that Defendants Bundy, Rodriguez, PRN and Freedom Man Press, LLC, used their defamatory statements and disinformation rhetoric to trigger their followers to a call for action based on false premises, which then led to Defendants Bundy and Rodriguez creating conspiracy theories of heinous criminal allegations by Plaintiffs without any factual basis. In order to maximize the involvement of the

Defendants' followers, there was a strategic coordination of the false and defamatory messages being repeated over websites controlled by Defendants and shared with other extremist media outlets.

62. Defendants' followers then quickly joined the protest at the hospital and the efforts outside Idaho to disrupt the business of St. Luke's by flooding the phone lines. The false and defamatory statements of Bundy and Rodriguez were then used by followers and the Defendants to harass and intimidate the Plaintiffs via verbal, in-person and online threats.

63. Bundy directed his followers to be ready to "fight it out on the street." Bundy and Rodriguez created a false and defamatory conspiracy theory against the Plaintiffs and repeated it over and over again in an effort to have St. Luke's put out of business and the medical providers to lose their jobs. The Plaintiffs testified they believed the statements presented real threats of violence to them personally as well as their families. Plaintiffs testified as to the specific steps they took as a result of the intimidation and defamatory statements to protect themselves and their family members. Plaintiffs also testified to having to daily track the social media of all the Defendants to weigh and prepare for threatened harm.

64. According to Jessica Flynn, an expert on reputational harm, and Beth Toal, St. Luke's Vice President for Communications, Bundy's and Rodriguez's tactics are deliberate and intentional. Their marketing techniques and use of social media have the effect of disseminating knowingly defamatory information and disinformation to radicalize their followers and at the same time get media coverage of their actions and raise monies for their organizations based on their defamatory statements. The Defendants wanted their



messages to go viral as well as deep and wide, and to have lasting effects. The Defendants wanted their social media attack and protests to prevent St. Luke's from providing services to others. The Defendants also created a clear connection in their social media for contributions to support their conduct. The media recognition gained by the Defendants through their disinformation and defamatory statements is intended to raise their individual profiles as well as their organizations' profiles.

65. The extremist and marketing experts testified the Defendants also used the Infant being taken into CPS custody to increase their own visibility on the internet and in the community as well as to raise money for themselves through the organizations they controlled. This conduct continues to the present and it is not expected to stop as it is a source of fundraising for Bundy's and Rodriguez's organizations.

66. Defendants Bundy and Rodriguez organized and promoted the protests at St. Luke's. These protests involved armed individuals, which is consistent with Bundy's involvement in prior protests and his statements/trainings of his followers about the use of force. The experts testified that the militia training promoted and offered by PRN creates a threat and possible risk of physical harm.

67. On the advice of law enforcement, who indicated they could not restrain the number of protesters (estimated to be 400 persons), St. Luke's was forced to lock down the entire downtown campus and to redirect patients to other facilities.

68. The lockdown also prevented families from entering the hospital to see their loved ones, prevented third parties from seeking care or attending a scheduled appointment at the Boise campus, and prevented employees from coming or leaving their shifts.

69. St. Luke's Chief Financial Officer as well as Dennis Reinstien, CPA, testified that economically St. Luke's lost significant revenue from cancelled treatment or appointments. St. Luke's also incurred additional security costs during the protests and had to increase the number of individuals involved in security at all of its facilities to be prepared for future protests organized by the Defendants.

70. The Defendants knew or reasonably should have known the statements they were making were false and defamatory. Defendant Rodriguez is the grandfather of the Infant and the medical records provided to his daughter (mother of the Infant) easily could have been reviewed by him. Instead, he made false and defamatory statements regarding the health of the Infant, the actual medical care diagnoses and the care provided.

71. Rodriguez also claimed without any legal statutory support that the actions of the CPS were unlawful and was involved with a marketing plan for donations for the Infant and its family, as well as to monetize his and Bundy's organizations.

72. No evidence was presented that any of the Defendants have medical training, knowledge or education to support their false and defamatory statements regarding the Infant's health status and the need for medical care.

73. The intentional, materially false and malicious defamatory statements by the Defendants include, but are not limited to, the following:

- a. The Infant was perfectly healthy when taken by CPS.
- b. St. Luke's made the Infant sick and infected the Infant with disease.
- c. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.

- d. St. Luke's, St. Luke's management, law enforcement, DHW, the courts, and the medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- e. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- f. DHW makes more money for every child it takes into CPS custody and that is why the DHW kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- g. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- h. St. Luke's reported the parents to CPS.
- i. Dr. Erickson threatened to file a report with CPS if the parents did not agree to the treatment plan between March 1-4, 2022.
- j. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.
- k. The family was discriminated against because the Infant was unvaccinated.
- l. The parents have thousands of dollars of medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
- m. The parents did not consent to the medical treatment provided to the Infant.



n. The Infant was released from the Children's Hospital and returned to directly to the family due to *the protesters'* or Defendants', actions.<sup>4</sup>

74. These false statements were repeated again and again by Defendants, including using links to the statements on other websites and video recordings. "Wanted" posters were made for Mr. Roth, Dr. Erickson and NP Jungman (as well as others involved who were doxxed) and posted on the internet as well as distributed at the protests at the St. Luke's Boise campus. The Plaintiffs and others involved in the events were repeatedly threatened by Defendants' actions of encouraging their followers to take action into their own hands and disclosing personal information about Mr. Roth, Dr. Erickson and NP Jungman. Phone messages to St. Luke's from followers across the county repeated the false and defamatory statements of Bundy and Rodriguez.

75. St. Luke's senior management officers testified it is now more difficult to recruit doctors and other medical providers to Idaho due to the events surrounding the Infant and the Defendants' harassment and defamatory statements towards St. Luke's and its employees.

76. The defamatory statements by the Defendants were completely unfounded, false, made intentionally, and maliciously harmed the reputations of the Plaintiffs and others who were doxxed. These false statements invaded the privacy of Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman by portraying them in a false light as persons who harm children. The defamatory statements and conduct of the Defendants intentionally inflicted emotional distress on Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman as

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<sup>4</sup> The Infant was returned to its parents by the Court through the dismissal of the CPS case, not the actions of Defendants.

well as other parties who were doxxed and threatened. Mr. Roth, Dr. Erickson and NP Jungman all presented substantial and credible evidence of the actual harm they (and their families) suffered due to Defendants' defamatory statements, invasion of privacy and intentional infliction of emotional distress upon Plaintiffs by attacking their professional reputations.

77. Experts Devin Burghart, Spencer Fomby, and Jessica Flynn all testified that once on the internet, it is difficult to remove defamatory statements from the internet. In this case, the Defendants took steps to regularly re-post prior videos and postings and to create links to the false statements on the website of other media sources, thereby knowingly increasing the viewers of the published defamatory statements. The original posts as well as present statements continue on the Internet such as when Bundy or Rodriguez are quoted with links to other websites about this litigation. See Idaho Dispatch quotes and postings in the Declaration of Jennifer Jensen in support of the requested injunctive relief.

78. The extremist organization experts testified the defamatory statements are re-posted by the Defendants in order to keep them in the news and to generate new followers and more donations.

79. C.P. "Abby" Abbodandolo, Senior Director of Security for St. Luke's, who has extensive hospital security and law enforcement experience, testified he was shocked how quickly the Defendants could mobilize their followers to protest, make signs, and come armed and ready to take action. He also testified the Defendants and their followers create an ongoing threat to St. Luke's operations throughout the state.

80. The DHW Safety Assessor left DHW employment and moved out of state due to the doxxing. Dr. Thomas testified she is leaving and moving from the state for a period of time in hopes that she can safely return to practice medicine. Employees left St. Luke's employment due to the protesting and intimidation. Dr. Erickson has considered leaving a job she loves due to the ongoing emotional distress and intimidation of the Defendants. NP Jungman has suffered and continues to suffer from emotional distress, and the intimidation affects how she interacts with parents of other patients.

81. The extremist group experts Burghart, Fomby, and Flynn described both Bundy and Rodriquez as an anti-government activists, conflict disrupters, and disrupter entrepreneurs. Their business model is to raise money for themselves or the organizations they control from followers based on false, fraudulent and defamatory statements. The Defendants have used disinformation (misinformation that is intentionally spread) to harm Plaintiffs.

82. Dr. Camille LaCroix, Forensic Psychiatrist, testified as to the continuing emotional distress to Dr. Erickson and NP Jungman, and that this is not likely to go away and gets worse every time there is a new or a re-posting of a defamatory statement, an article or threat against them personally. Dr. Erickson's husband testified as to the need to continually monitor social media postings to make sure his wife and family are safe. According to Dr. LaCroix, Dr. Erickson and NP Jungman can be triggered and suffer more emotional distress by the re-posting of defamatory statements and invasions of their privacy that cause them to change how they treat others and how they protect their families.



83. Dr. Erickson and NP Jungman each testified that defamatory statements, harassment and intimidation as a result of Defendants' actions affects their life every day professional and in their personal relationships. Both testified as to the constant fear they have due to Defendants defamatory attacks in the newspapers, on tv, and on the internet.

84. The evidence provided at the jury trial was substantial and competent evidence that established the claims of defamation, invasion of privacy and intentional infliction of emotional distress due to the Defendants' conduct. These claims were satisfied by the applicable burden of proofs of preponderance and clear and convincing evidence.

85. As to the defamation claims, the Court finds:

- a. The Defendants communicated information concerning the Plaintiffs to others;
- b. The information impugned the honesty, integrity, virtue or reputation of the Plaintiffs or exposed the Plaintiffs to public hatred, contempt or ridicule;
- c. The information was false;
- d. The Defendants knew it was false or reasonably should have known that it was false; and
- e. Plaintiffs suffered injury caused to the defamation.

86. As to the Invasion of Privacy claims, the Court finds:

- a. The Defendants placed Mr. Roth, Dr. Erickson, and NP Jungman in a false light in the public eye by publicly disclosing some falsity or fiction concerning Mr. Roth, Dr. Erickson, and NP Jungman.
- b. A disclosure of some falsity or fiction means that a publication or publications by

Defendants were materially false.

- c. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman suffered injury caused by the false light invasion of their privacy.

87. As to the Intentional Infliction of Emotional Distress claims, the Court finds:

- a. Defendants engaged in intentional or reckless conduct;
- b. That was extreme and outrageous;
- c. Causing severe emotional distress to Mr. Roth, Dr. Erickson, and NP Jungman;  
and
- d. Plaintiffs Mr. Roth, Dr. Erickson and NP Jungman were injured and the emotional distress was proximately caused by Defendants' conduct.

88. The Defendants' defamatory statements including allegations of conspiracy by the Plaintiffs, law enforcement, the courts and DHW to engage in criminal conduct against children is not supported by any evidence.

89. The false and defamatory statements were made as part of a tactical and sustained marketing campaign to defame and smear the reputations of the Plaintiffs, incite unlawful conduct by Defendants' followers, create a fear of future physical harm to Plaintiffs, and to create an incentive for followers to make donations to Defendants or organizations they controlled.

90. The Defendants actions in this case, as well as the fact that they refuse to stop making defamatory statements, repeat past defamatory statements, presents a continuing threat of actual irreparable harm to Plaintiffs. The continuing threat has led to St. Luke's increasing its security at each of its hospitals. The named Plaintiffs continue to be the subject of threats by Defendants or their followers. The threats include but are not



limited to personal, professional or family member harm through Defendants internet presence and re-posting of prior defamatory statements. A prior Protection Order by the Court has failed to deter Defendants from making knowingly false and defamatory statements and repeating such statements.

### **Conclusions of Law**

The Court requested supplemental legal support for Plaintiffs position they are entitled to equitable relief in the form a permanent injunction. Plaintiffs file a memorandum and supplemental brief and declaration in support of the request injunctive relief. In the Declaration of Jennifer M. Jensen, she indicates the Idaho Dispatch (which is not a party to this lawsuit) continues to post Defendant Rodriguez's and Bundy's defamatory statements about the Plaintiffs and counsel involved in this case on the internet even after the jury trial on damages has ended. Defendant Rodriguez filed an "Answer to Request for Permanent Injunctive Relief."<sup>5</sup> The Court has considered the findings of fact and the entire court record including Rodriguez's filings in making its ruling on injunctive relief.

#### **1. Whether or not to grant permanent injunctive relief is within the discretion of the trial court.**

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<sup>5</sup> Defendant Rodriguez claims in part there has never been an evidence-based trial as to whether or not the things he said were true and he believes all his statements were true. The Court notes the jury trial was evidence-based (with testimony and admitted exhibits), but Defendant Rodriguez elected not to attend and cross examine witnesses or challenge the admissibility of evidence. Defendant Rodriguez also claims injunctive relief is a violation of his First Amendment rights. For the reasons discussed in this Findings of Fact and Conclusions of Law, the Court finds injunctive relief is allowed as a matter of law and appropriate in this case.

In *Gem State Roofing, Incorporated v. United Components, Incorporated*, 168 Idaho 820, 828, 488 P.3d 488, 496 (2021), the Idaho Supreme Court held “The granting or refusal of an injunction is a matter resting largely in the trial court’s discretion.” (citing *Higginson v. Westergard*, 100 Idaho 687, 689, 604 P.2d 51, 53 (1979)). In applying its discretion, this Court must: (1) correctly perceive the issue as one of discretion; (2) act within the outer boundaries of its discretion; (3) act consistently with the legal standards applicable to the specific choices available to it; and (4) reach its decision by the exercise of reason. *Lunneborg v. My Fun Life*, 163 Idaho 856, 863, 421 P.3d 187, 194 (2018). The Supreme Court in *Gem State Roofing* went on to discuss the different standards for preliminary versus permanent injunctions:

As an initial observation, UCI’s reliance on the standard for a *preliminary* injunction is inapposite. Rule 65(e) enumerates five grounds for entry of a preliminary injunction. A preliminary injunction is a temporary injunction effective for the pendency of the litigation before the merits of the case are decided. I.R.C.P. 65(e). Preliminary injunctions are designed to protect clearly established rights from imminent or continuous violation during litigation. See *Gordon v. U.S. Bank Nat’l Ass’n*, 166 Idaho 105, 455 P.3d 374, 384 (2019) (quoting *Brady v. City of Homedale*, 130 Idaho 569, 572, 944 P.2d 704, 707 (1997)) (“A district court should grant a preliminary injunction ‘only in extreme cases where the right is very clear and it appears that irreparable injury will flow from its refusal.’”). A permanent injunction, on the other hand, is entered at the resolution of the case, and requires a showing of threatened or actual irreparable injury; in addition, in order to deny a permanent injunction the trial court must be persuaded that there is “no reasonable expectation that the wrong will be repeated.” *O’Boskey*, 112 Idaho at 1007, 739 P.2d at 306. In other words, a trial court may appropriately deny a preliminary injunction at the outset of a case when there are complex issues of fact and law yet to resolve, but correctly grant a permanent injunction once those issues have been resolved in favor of the plaintiff.

*Gem State Roofing*, 168 Idaho 820, 834–35, 488 P.3d 488, 502–03 (2021).

In this case, the Court finds based on the Findings of Fact and the Declaration of Jennifer Jensen, the Plaintiffs have established by substantial and competent evidence of threatened or



actual irreparable damage as well as a reasonable expectation that the wrong will be repeated by the Defendants if permanent injunctive relief is not granted. The jury's monetary damages, if able to be collected, are inadequate to protect Plaintiffs from continued and ongoing injuries to their reputations, privacy, emotional health, ability to practice their chosen professions and reside in the community without fear, and to allow the community to trust that St. Luke's hospital system is not in any way engaged in heinous criminal conduct towards its patients. Balancing the hardships between Plaintiffs and Defendants' alleged chilling of their freedom of speech rights, the balance tips in favor of Plaintiffs. A remedy in equity is warranted as defamatory speech is not protected free speech. Finally, the public interest would not be disserved by a permanent injunction of the scope outlined in this decision. The permanent injunctive relief is appropriate to eliminate the ongoing irreparable threatened and actual harm to all Plaintiffs.

**2. Defendants' defamatory statements are not protected speech under the First Amendment.**

The United States is a republic founded on the doctrine of the rule of law. What that means is all persons are expected to follow the laws adopted through our representational form of government. It also means all persons, no matter their status, wealth or beliefs must follow the rule of law.

The First Amendment to the United States Constitution provides:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press or the right of the people to peacefully assemble, and to petition the Government for a redress of grievances.

However, these rights are not absolute. Every right under the Constitution is subject to limits, and a person or entity cannot make or publish knowingly false statements that intentionally cause reputational or other damage to another and then hide behind the First Amendment as a shield. The

United States Supreme Court has recognized categories of speech that the government can regulate because of the content of the speech, as long as the government does so evenhandedly. *See R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992) (categories of speech that are limited: obscenity, defamation, fraud, incitement, fighting words, true threats, speech integral to criminal conduct, and child pornography). In *R.A.V.* the Court stated:

The First Amendment generally prevents government from proscribing speech, *see, e.g., Cantwell v. Connecticut*, 310 U.S. 296, 309–311, 60 S.Ct. 900, 905–906, 84 L.Ed. 1213 (1940), or even expressive conduct, *see, e.g., Texas v. Johnson*, 491 U.S. 397, 406, 109 S.Ct. 2533, 2540, 105 L.Ed.2d 342 (1989), because of disapproval of the ideas expressed. Content-based regulations are presumptively invalid. *Simon & Schuster, Inc. v. Members of N.Y. State Crime Victims Bd.*, 502 U.S. 105, 115, 112 S.Ct. 501, 508, 116 L.Ed.2d 476 (1991) *id.*, at 124, 112 S.Ct., at 512–513 (KENNEDY, J., concurring in judgment); *Consolidated Edison Co. of N.Y. v. Public Serv. Comm'n of N.Y.*, 447 U.S. 530, 536, 100 S.Ct. 2326, 2332–2333, 65 L.Ed.2d 319 (1980); *Police Dept. of Chicago v. Mosley*, 408 U.S. 92, 95, 92 S.Ct. 2286, 2289–2290, 33 L.Ed.2d 212 (1972). From 1791 to the present, however, our society, like other free but civilized societies, has permitted restrictions upon the content of speech in a few limited areas, which are “of such slight social value as a step to truth that any benefit that may be derived from them is clearly outweighed by the social interest in order and morality.” *Chaplinsky, supra*, 315 U.S., at 572, 62 S.Ct. at 762. We have recognized that “the freedom of speech” referred to by the First Amendment does not include a freedom to disregard these traditional limitations. *See, e.g., Roth v. United States*, 354 U.S. 476, 77 S.Ct. 1304, 1 L.Ed.2d 1498 (1957) (obscenity); *Beauharnais v. Illinois*, 343 U.S. 250, 72 S.Ct. 725, 96 L.Ed. 919 (1952) (defamation); *Chaplinsky v. New Hampshire, supra* (“‘fighting’ words”); *see generally Simon & Schuster, supra*, 502 U.S., at 124, 112 S.Ct., at 513–514 (KENNEDY, J., concurring in judgment). Our decisions since the 1960’s have narrowed the scope of the traditional categorical exceptions for defamation, *see New York Times Co. v. Sullivan*, 376 U.S. 254, 84 S.Ct. 710, 11 L.Ed.2d 686 (1964); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 94 S.Ct. 2997, 41 L.Ed.2d 789 (1974); *see generally Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 13–17, 110 S.Ct. 2695, 2702–2705, 111 L.Ed.2d 1 (1990), and for obscenity, *see Miller v. California*, 413 U.S. 15, 93 S.Ct. 2607, 37 L.Ed.2d 419 (1973), but a limited categorical approach has remained an important part of our First Amendment jurisprudence.

We have sometimes said that these categories of expression are “not within the area of constitutionally protected speech,” *Roth, supra*, 354 U.S., at 483, 77 S.Ct., at 1308; *Beauharnais, supra*, 343 U.S., at 266, 72 S.Ct., at 735; *Chaplinsky, supra*, 315 U.S., at 571–572, 62 S.Ct., at 768–769; or that the “protection of the First Amendment does not extend” to them, *Bose Corp. v. Consumers Union of United*



*States, Inc.*, 466 U.S. 485, 504, 104 S.Ct. 1949, 1961, 80 L.Ed.2d 502 (1984); *Sable Communications of Cal., Inc. v. FCC*, 492 U.S. 115, 124, 109 S.Ct. 2829, 2835, 106 L.Ed.2d 93 (1989).

*R.A.V. v. City of St. Paul*, 505 U.S. 377, 382–83 (1992).

Stated another way, defamation is a limit on both freedom of speech and freedom of the press. A person or entity cannot say “I believed what I was saying was true” when the undisputed facts establish those “truths” were known to be false or should have been known to be false by the Defendants and they were spoken with the specific intent to threaten or cause harm to the other person or entity.

The defamatory statements made by Defendants here were not just disagreements with the manner in which the CPS laws are enforced. Instead, the defamatory statements by Defendants were made intentionally to get others to believe “as true” that Plaintiffs and anyone else involved in the CPS investigation and court proceedings or medical treatment of the Infant were committing heinous acts against the Infant, and that St. Luke’s and the other Plaintiffs were “wicked” and “evil” persons such that they should be removed from their professions and the hospital shut down from providing all medical care to anyone in our community. There is no evidence (only baseless allegations by Defendants) of any such conduct by the Plaintiffs or any other party involved in the CPS case involving the Infant. In a court of law, the party claiming truth as a defense must present evidence of truth, and Defendants did not do so.

Here, the Defendants’ statements in every possible form were intentional and with reckless disregard for the truth, fraudulent, malicious and defamatory. As the jury instructions explained, defamation is the injury to one’s reputation either by written expression, which is libel, or by oral expression, which is slander. The law is well-established that speech which is defamatory and causes harm is not protected by the First Amendment. As indicated in the above quote from the

Supreme Court, defamation in our common law existed prior to the founding of this country and has been recognized since 1791 by our courts. Further, the mere fact that religious beliefs are cited as motivation for the Defendants' actions does prevent the statements from being defamatory or illegal invasions of another's right to privacy.<sup>6</sup> Nor does the cloak of the Defendants' religious beliefs that the Plaintiffs were "wicked" allow First Amendment protection to the statements such that the statements cannot also be defamatory.

Additionally, the United States Supreme Court recently reaffirmed fraudulent statements made to encourage or induce illegal immigration for financial gain are not protected speech under the First Amendment. *See United States v. Hansen*, 2023 WL 4138994, \_\_ U. S. \_\_, 143 S.Ct. 1932 (2023). "Speech intended to bring about a particular unlawful act has no social value; therefore, it is unprotected." *Williams*, 553 U.S. at 298, 128 S.Ct. 1830." *Id.* at 1947 (2023). Defendants' conduct in this case included false, fraudulent and defamatory statements made in part for their own financial gain and such speech is not protected. People are free to give money to whatever organizations or persons they want, but they should be informed if the statements to support such donations of monies are not true.

Finally, simply saying a statement over and over does *not* make it true. It is well-established law that a person can tell certain lies and those lies are protected by the First Amendment. *See United States v. Alvarez*, 567 U.S. 709 (2012) where an individual was being criminally prosecuted for falsely claiming to have received a military medal of honor pursuant to the Stolen Valor Act was a content-based restriction on free speech. The difference here is that Defendants' statements were not lies about themselves; they were false, intentional and defamatory statements about others which were intended to hurt Plaintiffs' reputations or businesses. No reasonable person would

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<sup>6</sup> Indeed, the Court cannot to find any religious support for bearing false witness against another.  
FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR INJUNCTIVE RELIEF  
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think these statements were meant for any other purpose than to harm the reputations and to threaten the persons being attacked by such statements. Such statements are not protected speech under the First Amendment.

Listening to and watching the videos of the Defendants and the published written statements of the Defendants Bundy and Rodriguez that claim their belief that “they” had the individual “right” to take the Infant (who is not even their child) back by violence if necessary is a profound misstatement and misunderstanding of the rule of law. In reality, it is a cry for “vigilante justice” which is the act of enforcing the law without legal authority to do so. Vigilante justice does not involve due process and allows one person to be the lawmaker, the law enforcer, the judge and jury without any investigation into the truth. Vigilante justice is not a “right” an individual or group of individuals have in this country.

Laws are passed by duly elected persons through a legislative process involving two representational governmental bodies and then also approved by the executive officer (the President of the United States or the Governor of a state). Laws are enforced by law enforcement officers in the executive branch of government. Challenges to the laws as being facially unconstitutional or unconstitutional as applied are for the judicial branch to decide.

Vigilante justice is not tolerated under the Constitution because it violates the rights of the accused. Vigilante justice expounded by the Defendants is meant to control others not by the rule of law, but by intimidation through threats of violence and the public shaming of others. Defendants clearly believe they are above the law and can operate outside the boundaries of our laws if they disagree with how the laws are being applied. That is not how our government works. A party can appeal a court’s ruling and seek appellate review of a decision. The manner in which

to challenge any court's ruling is not through threat and intimidation. It is through the judicial process.

Moreover, if Defendants want the CPS statutes to be revised or changed, then they can lobby the legislature. While it is unclear exactly what changes to the law the Defendants seek, they are free to propose changes by working directly with legislators to sponsors bills. The Idaho Legislature has a long history of protecting children through the DHW, and nothing in this trial established the procedure approved by the Legislature was not followed or was misapplied based on the true health status of the Infant and the failure of the parents to allow the Infant to be seen for follow-up care. In fact, this case is an example of the CPS system working exactly as intended by the Legislature to protect the well-being of a child.

In several of the published statements by Defendants Bundy and Rodriguez they encouraged their followers to "follow the money" to prove how children are being harmed, trafficked, or kidnapped by CPS. No actual evidence was cited for this proposition by the Defendants and it was proven to be false at trial. Instead, the evidence in this case shows the only money being "made" by the events involving the Infant were St. Luke's and other medical practitioners receiving Medicaid reimbursement for the medical services provided (which was testified to be 70% of the actual cost of the care) and money flowing from donations by Defendants' followers (based on false defamatory statements about the Plaintiffs and others) to Defendants Bundy, Ammon Bundy for Governor, Rodriguez, People's Rights Network, Freedom Man Press LLC and Freedom Man PAC.

If Defendants wanted to present a defense of the "truth" of their statements, they could have participated in this lawsuit or at least the damages trial. They did not. The Court must take the undisputed facts presented at trial as true. Moreover, independent expert medical testimony as



well as common sense establishes the facts were not as Defendants maintained. The actual numerous weights taken of the Infant as well as the results of other medical tests and the pictures of the Infant did not present a healthy infant. Dr. Wheaton testified there was no misdiagnosis or malpractice by the medical providers.

The Court finds St. Luke's did not initiate nor threaten to initiate CPS action. Did St. Luke's become involved after the Infant was taken into the custody of DHW? Yes. However, no child was "kidnapped" by the police or doctors. No child was "trafficked" or abused by DHW, the hospital, the doctors or the courts. Instead, St. Luke's through its staff and medical providers provided the *necessary* medical care the Infant needed (twice) and took care to receive the parents' consent for the care provided even though during the second hospitalization was when the Infant was in the temporary care and custody of DHW. All of the Infant's medical care was covered by Medicaid insurance.

Dr. Whelan testified the need for CPS to get involved was due to the parents' failure to attend follow-up appointments. In making this last statement, the Court does not in any way believe the parents intended to harm the Infant. But the parents did neglect the medically needed follow-up appointments to make sure the Infant was gaining, not losing, weight. New parents have a plan for how they want to care for their child and they are allowed great freedom in implementing their plan, until and unless the child's welfare is at risk. At that point, the DHW has a duty to step in, to get the child the care it needs and then to develop a reunification plan so the child can return to its home and thrive.

**3. Permanent injunctive relief is appropriate in this case.**

Permanent injunctive relief requiring the Defendants to stop making defamatory statements about the Plaintiffs, to remove defamatory and harassing statements or posts from online locations under the Defendants' control and prohibiting the Defendants from republishing the statements or posts is appropriate in this case. The statements, internet posts, online interviews made as part of a sustained campaign of defamation by Defendants and they continue to threaten or cause actual irreparable harm to the Plaintiffs. Based on the testimony of Mr. Roth, Dr. Erickson, NP Jungman, this conduct not only affects the individual Plaintiffs, but it also affects their families, their co-workers, their work environments. It also continues to negatively impact the reputation of St. Luke's in the community. The Court has no expectation that the defamatory statements will stop by Defendants without a permanent injunction.

This type of conduct can be enjoined by a court. While the Court could not find any on-point Idaho authority for the factual circumstances presented in this case, the Court can look to other jurisdictions for persuasive authority for internet smear campaigns. *See, e.g., Balboa Island Vill. Inn, Inc. v. Lemen*, 40 Cal. 4th 1141, 1155-57 (2007) (holding that the court may issue an injunction prohibiting the defendant from repeating statements judicially determined to be defamatory and rejecting argument that damages are the only remedy for defamation because otherwise the plaintiff would be required to bring a succession of lawsuits for damages which could be insufficient to deter the continuing tortious behavior); *Advanced Training Sys. v. Caswell Equip. Co.*, 352 N.W. 2d 1, 11 (Minn. 1984) (affirming permanent injunctive relief prohibiting republication of material found libelous at trial); *Weitsman v. Levesque*, Case No. 19-CV-461 JLS (AHG), 2020 WL 6825687, (S.D. Cal. Nov. 20, 2020) (applying New York law and collecting New York cases that removal orders are



necessary when parties refuse to depublish); *see also St. James Healthcare v. Cole*, 178 P.3d 696, (Mont. 2008) (affirming in part preliminary injunction against harassing and threatening statements).<sup>7</sup>

In *Weitsman*, the court ordered permanent injunctive relief when the defendant engaged in a “sustained Internet defamation campaign” falsely accusing the plaintiff of child trafficking. *Weitsman*, 2020 WL 6825687. The court entered default against the defendant, and the plaintiff obtained an award of compensatory and punitive damages. *Id.* The defendant had continued making the defamatory statements online, despite the litigation and an arrest warrant. *Id.* A permanent injunction was appropriate due to the intentional, sustained campaign of defamation aimed to injure the plaintiff’s interests, including business interests. *See id.* The injunction was tailored to (1) require the removal of statements held to be defamatory whose postings online were under the defendant’s control; and (2) prohibit the republication of statements held to be defamatory. *See id.*

The Defendants’ actions attacking Plaintiffs in this case were relentless for over a year and with the specific intent to harm the reputations of St. Luke’s and the other named Plaintiffs who did their job to ensure the Infant received necessary medical care. The Defendants continue to the present time in making defamatory statements to others about the Plaintiffs. There is every indication based on the Defendants’ conduct over the prior year that the Defendants will continue to repeat and re-post the defamatory statements if no injunction is entered. The Court recognizes the Defendants have the means to influence thousands of followers, as they quickly organized protestors at the hospitals and across the country to disrupt St. Luke’s business. This ability to mobilize others and to condone violence makes the threatened irreparable harm even more likely.

As several experts testified at trial, that once on the internet, it is difficult to remove defamatory statements from the internet, a simple retraction is inadequate relief for the Plaintiffs. Plaintiffs are entitled by law to have all the Defendants do everything in their power and on all

sites under their control (directly or indirectly) to remove all the judicially determined defamatory statements about the Plaintiffs. Moreover, the Defendants are ordered to stop making new or repeating previously made statements or postings with defamatory statements about the Plaintiffs. Further defamatory statements or invasion of Plaintiffs' privacy regarding the events with the Infant by Defendants could lead to new litigation for defamation. This defamation against the Plaintiffs is not protected by the First Amendment and it must end.

If the defamatory statements are not taken down, they will be repeated and cause more irreparable threatened or actual harm to the Plaintiffs. The Plaintiffs have a right under law to seek injunctive relief from the Court to force the Defendants to stop making and publishing defamatory statements about the Plaintiffs. Plaintiffs followed the rule of law and legal process for having such a remedy ordered by the Court. The Plaintiffs proved the statements were intentional, false and made by Defendants with the specific intent to cause reputational damage to the Plaintiffs and to invade the Plaintiffs' privacy. The Defendants continue to try to raise monies based on the defamatory statements.

#### **4. Scope of injunctive relief.**

The Court, in exercising its discretion, finds a permanent injunction is warranted under the law against the Defendants in this case. The Court exercises its discretion based on the findings of fact and conclusions of law to grant the equitable relief requested. "A permanent injunction requires a showing of threatened or actual irreparable injury." *Hood v. Poorman*, 171 Idaho 176, 519 P.3d 769, 783 (2022) (citing *O'Boskey v. First Fed. Sav. & Loan Ass'n of Boise*, 112 Idaho 1002, 1007, 739 P.2d 301, 306 (1987)). There is a threatened or actual irreparable injury to Plaintiffs if defamatory statements about the care of the Infant and the Plaintiffs are not stopped. The Defendants are aware their statements have been found by a jury and court of law to be



defamatory, so continuing to say the statements are true may expose Defendants to additional legal liability.

Defendants will be ordered to take the following actions to remove all defamatory statements and violations of the privacy of the Plaintiffs. Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.
6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

Failure by the Defendants to follow the Order for Permanent Injunctive Relief may lead to contempt proceedings, sanctions and other legal ramifications.

### **Conclusion**

Fortunately for the Infant and our community, the Plaintiffs ignored the actions of the disrupters led by Bundy and Rodriguez and instead made saving the life of the Infant their priority. Plaintiffs St. Luke's and Mr. Roth were not distracted from their mission of providing medical care when needed to any member of our community regardless of a person's ability to pay. St. Luke's followed established medical treatment procedures and DHW followed Court orders, not the demands of the Defendants. Dr. Erickson and NP Jungman followed their oaths to help and not harm their patient. But the disinformation continues by Defendants even after the Infant was returned to its parents by the court through the CPS proceedings, even after the civil lawsuit was filed, and even after the jury verdict was returned.

Defendants' continued disinformation regarding the Plaintiffs does not help our community. The actions and conduct of the Defendants have made our community less safe. Medical providers and other employees are leaving their professions because of the damage to their reputations, the invasion of their privacy, the harassment and threats of intimidation by Defendants. Defendants' conduct and the conduct of their followers selfishly prevented third parties from coming to the St. Luke's hospitals and clinics for care, prevented the family members of other patients from seeing their loved ones at the hospital, disrupted the care of other patients, and threatened the safety of employees due to the sheer noise and intimidation of armed protestors surrounding the Boise hospital. The First Amendment protects and allows citizens to protest, but the First Amendment does not allow armed citizens to attempt to enter the private property of St. Luke's when it was locked down.

The defamatory statements of Defendants against the Plaintiffs have the indirect effect of making it more difficult to attract medical professionals to Idaho. The defamatory statements have



the direct effect of causing highly qualified medical professionals to leave the profession they love due the stress from the intimidation and threats of personal harm by Defendants and their followers. The defamatory statements have the direct effect of making it more difficult for other community members to safely access medical care when needed.

A permanent injunction is warranted and appropriate in this case to stop Defendants from reposting and repeating statements that have been deemed by a jury and the Court to be defamatory and harmful to the reputational interests, privacy interests and emotional health of the Plaintiffs. A retraction by Defendants is insufficient to reverse the continued threat of irreparable harm to the Plaintiffs. Monetary damages, even if they can be collected, are inadequate to protect against further harm to the Plaintiffs or to deter Defendants. In order to avoid the threatened or actual irreparable harm to Plaintiffs reputations, professions, emotional health, the defamatory statements of the Defendants must to be removed from the online sources controlled by Defendants (directly or indirectly) and no longer repeated orally by Defendants.

### **Order**

Based on the Findings of Fact and Conclusions of Law, the injunctive relief requested by the Plaintiffs is appropriate and shall be ordered by the Court in a separate Permanent Injunction Order. Plaintiffs shall submit a proposed Permanent Injunction Order for the Court's review consistent with these Findings of Fact and Conclusions of Law. Plaintiffs are also directed to provide a proposed Default Judgment to be entered consistent with this Order, the jury verdict and previous attorney fees as sanctions ordered by the Court.

IT IS SO ORDERED.

Dated: 8/25/23

  
NANCY A. BASKIN  
District Judge

CERTIFICATE OF SERVICE

I, the undersigned, certify that on 8/25/23, I caused a true and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR INJUNCTIVE RELIEF to be forwarded with all required charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following person(s):

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Orlando, FL 32804  
*Pro Se Defendant*

TRENT TRIPPLE  
Clerk of the District Court

By   
Deputy Clerk



### CLERK'S CERTIFICATE OF ATTESTATION AND TRUE COPY

St Lukes Health System LTD, St Lukes Regional Medical Center  
LTD, Chris Roth, Natasha Erickson, MD, Tracy Jungman  
Plaintiff,

vs.

Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez,  
Freedom Man PAC, Peoples Rights Network, Freedom Man Press  
LLC  
Defendant.

Case Number: CV01-22-06789

I, Theresa Fuze, Deputy Clerk of the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, do hereby certify that the annexed copies of the Default Judgment, in the case of St Lukes Health System LTD, St Lukes Regional Medical Center LTD, Chris Roth, Natasha Erickson, MD, Tracy Jungman vs Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man PAC, Peoples Rights Network, Freedom Man Press LLC, have been by me compared with the originals, and that these are a correct transcript and true copies there from and of the whole of such original records as the same appear on file and of record in my office and in my custody.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of said Court on 9/15/2023 8:28:37 AM

Trent Tripple  
Clerk of the District Court of the Fourth  
Judicial District, in and for the County of Ada.

*Theresa Fuze*  
Deputy Clerk

### CERTIFICATE OF PRESIDING JUDGE

I, Nancy Baskin, presiding ~~Magistrate or~~ District Judge of the Fourth Judicial District of the State of Idaho, do hereby certify that Trent Tripple, and his/her deputy who signed the foregoing certificate of attestation is now and was at the time of signing and sealing of the same, the duly elected, qualified and acting Clerk of the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada; that he/she is the legal keeper of the records and seal of said Court; that his/her signature as it appears signed to the said certificate of attestation is genuine; that the seal affixed to said certificate is the seal of said Court; and that the attestation is in due form and, by the proper officer.

IN WITNESS WHEREOF, I have hereunto set my hand on 9/18/2023 7:03:03 PM

*Nancy A. Baskin*  
Judge Nancy Baskin

### CERTIFICATE OF THE CLERK

I, Theresa Fuze, Deputy Clerk of the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, do hereby certify that Nancy Baskin, who signed the foregoing certificate, now is, and was at the time of the signing of the same, the presiding Magistrate or District Judge of said Court, duly elected and qualified; that said Court is a Court of record; and that the signature of said presiding Magistrate or District Judge, as it appears, signed to said certificate is his/her genuine signature.

IN WITNESS WHEREOF, I have hereunto set my hand on 9/18/2023

Trent Tripple  
Clerk of the District Court of the Fourth  
Judicial District, in and for the County of Ada.

*Theresa Fuze*  
Deputy Clerk

EXHIBIT

B

Filed: 08/29/2023 09:37:22  
Fourth Judicial District, Ada County  
**Trent Tripple, Clerk of the Court**  
By: Deputy Clerk - Nelson, Ric

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.  
LUKE'S REGIONAL MEDICAL CENTER,  
LTD; CHRIS ROTH, an individual;  
NATASHA D. ERICKSON, MD, an  
individual; and TRACY W. JUNGMAN, NP,  
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON  
BUNDY FOR GOVERNOR, a political  
organization; DIEGO RODRIGUEZ, an  
individual; FREEDOM MAN PRESS LLC, a  
limited liability company; FREEDOM MAN  
PAC, a registered political action committee;  
and PEOPLE'S RIGHTS NETWORK, a  
political organization and an unincorporated  
association,

Defendants.

Case No. CV01-22-06789

**DEFAULT JUDGMENT**

**JUDGMENT IS ENTERED AS FOLLOWS:**

1. Judgment is entered in favor of Plaintiffs St. Luke's Health System, Ltd.; St. Luke's Regional Medical Center, Ltd.; Chris Roth, Natasha D. Erickson, M.D.; and Tracy W. Jungman, N.P. against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network.

DEFAULT JUDGMENT - 1

2. St. Luke's Health System, Ltd.'s and St. Luke's Regional Medical Center, Ltd.'s damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Nineteen Million One Hundred Twenty-Five Thousand Dollars [Fourteen Million One Hundred Twenty-Five Thousand (\$14,125,000)]** in compensatory damages and **Five Million Dollars (\$5,000,000)** in punitive damages].

3. Previously Court-ordered and unpaid attorneys' fees and costs of St. Luke's Health System, Ltd. and St. Luke's Regional Medical Center, Ltd. are awarded against:

- a. Defendant Ammon Bundy in the amount of **Thirteen Thousand Four Hundred Forty-Three Dollars and Twenty-One Cents (\$13,443.21)**;
- b. Defendant Ammon Bundy for Governor in the amount of **Six Thousand Eight Hundred Ninety-Five Dollars and Eighty-Six Cents (\$6,895.86)**;
- c. Defendant Diego Rodriguez in the amount of **Twenty-Two Thousand Eight Hundred Fifty Dollars and Seventy-Seven Cents (\$22,850.77)**;
- d. Defendant Freedom Man Press LLC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**;
- e. Defendant Freedom Man PAC in the amount of **Eight Hundred Ninety-Two Dollars and Twenty Cents (\$892.20)**; and
- f. Defendant People's Rights Network in the amount of **Eight Thousand Three Hundred Thirty-One Dollars and Ninety-Six Cents (\$8,331.96)**.

4. Chris Roth's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Eight Million Five Hundred Thousand Dollars (\$8,500,000) [Two Million One Hundred Twenty-Five Thousand Dollars**

**(\$2,125,000)** in compensatory damages and **Six Million Three Hundred Seventy-Five Dollars (\$6,375,000)** in punitive damages].

5. Natasha Erickson's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)** in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

6. Tracy Jungman's damages are awarded against Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network jointly and severally in the amount of **Twelve Million One Hundred Twenty-Five Thousand Dollars (\$12,125,000)** [**Five Million One Hundred Twenty-Five Thousand Dollars (\$5,125,000)** in compensatory damages and **Seven Million Dollars (\$7,000,000)** in punitive damages].

7. Interest shall accrue on all awarded damages bearing the statutory rate of 10.250% per annum until paid in full.

8. Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
  - i. The Infant was perfectly healthy when taken by Child Protective Services.
  - ii. St. Luke's made the Infant sick and infected the Infant with disease.



- iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
- iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
- v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
- vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
- vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
- viii. St. Luke's reported the parents to Child Protective Services.
- ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
- x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.

- xi. The family was discriminated against because the Infant was not vaccinated.
  - xii. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
  - xiii. The parents did not consent to the medical treatment provided to the Infant.
  - xiv. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protestors' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
- c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:
- <https://www.peoplesrights.org>, <https://www.votebundy.com>,  
<https://www.freedomman.org>, <https://stlukesexposed.com>,  
<https://www.facebook.com/SaveBabyCyrus/>,  
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>  
(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG).

d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.

e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:

<https://www.peoplesrights.org>, <https://www.votebundy.com>,

<https://www.freedomman.org>, <https://stlukesexposed.com>,

<https://www.facebook.com/SaveBabyCyrus/>,

<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>

(handle @RealABundy), <https://x.com> (handle @RealABundy),

[https://www.givesendgo.com/GAZAG?utm\\_source=sharelink&utm\\_medium=copy\\_link&utm\\_campaign=GAZAG](https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG).

f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

IT IS SO ORDERED.

DATED: 8/29/2023

STATE OF IDAHO }  
COUNTY OF ADA }

I, Trent Tripple, Clerk of the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, do hereby certify that the foregoing is a true and correct copy of the original on file in this office. In witness whereof, I have hereunto set my hand and affixed my official seal this 19 day of September, 2023.  
TRENT TRIPPLE

By: *[Signature]* Deputy

*[Signature]*  
NANCY A. BASKIN  
District Court Judge

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**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on 8/29/23, I caused a true and correct copy of the foregoing **Default Judgment** to be forwarded with all requires charges prepaid, by the method(s) indicated below, in accordance with the Rules of Civil Procedure, to the following persons:

Ammon Bundy for Governor  
People's Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett, ID 83617

- ☒ U.S. Mail  
☐ Hand Delivered  
☐ Overnight Mail  
☐ Email/iCourt/eServe:

Ammon Bundy  
Ammon Bundy for Governor  
People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

- ☒ U.S. Mail  
☐ Hand Delivered  
☐ Overnight Mail  
☐ Email/iCourt/eServe:

Freedom Man PAC  
Freedom Man Press LLC  
c/o Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- ☒ U.S. Mail  
☐ Hand Delivered  
☐ Overnight Mail  
☐ Email/iCourt/eServe:

Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

- ☐ U.S. Mail  
☐ Hand Delivered  
☐ Overnight Mail  
☒ Email/iCourt/eServe:  
[freedommanpress@protonmail.com](mailto:freedommanpress@protonmail.com)

Erik F. Stidham  
Jennifer M. Jensen  
Alexandra S. Grande  
Zachery J. McCraney  
Anne E. Henderson  
HOLLAND & HART LLP  
800 W. Main Street, Suite 1750  
Boise, ID 83702-7714

- ☐ U.S. Mail  
☐ Hand Delivered  
☐ Overnight Mail  
☒ Email/iCourt/eServe:  
[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)  
[jmjensen@hollandhart.com](mailto:jmjensen@hollandhart.com)  
[asgrande@hollandhart.com](mailto:asgrande@hollandhart.com)  
[zmccraney@hollandhart.com](mailto:zmccraney@hollandhart.com)  
[aehenderson@hollandhart.com](mailto:aehenderson@hollandhart.com)

DATED: 8/29/23

  
Clerk of the Court

Category of Defamation	Citation to PI for Court's conclusion re: category	Letter
Accusation of involvement in kidnapping children	¶ 59; ¶ 88	A
Accusation of involvement in child trafficking	PI ¶ 59; ¶ 73(d); ¶ 88	B
Accusation of involvement in child abduction	PI ¶ 59; ¶ 73(d); ¶ 88	C
Accusation of involvement in abuse of children	PI ¶ 59; ¶ 73(d); ¶ 88	D
Accusation of involvement in stealing children for money	PI ¶ 59; ¶ 73(c), (d); ¶ 88	E
Accusation of involvement in pedophilia	PI ¶ 59; ¶ 88	F
Criminal allegations against Plaintiffs	PI ¶ 61; ¶ 73(c), (d); ¶ 88	G
The Infant was perfectly healthy	PI ¶ 73(a) DJ at 3, ¶ 8(a)(i)	H
St. Luke's made the Infant sick; infected with disease	PI ¶ 73(b) DJ at 3, ¶ 8(a)(ii)	I
The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's	PI ¶ 73(c); ¶ 88 DJ at 4, ¶ 8(a)(iii)	J
St. Luke's, St. Luke's management, DHW, the courts, and the medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.	PI ¶ 73(d); ¶ 88 DJ at 4, ¶ 8(a)(iv)	K
The medical providers are pedophiles who want to abuse children and engage in child trafficking.	PI ¶ 73(e); ¶ 88 DJ at 4, ¶ 8(a)(v)	L
DHW makes more money for every child it takes into CPS custody and that is why DHW kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.	PI ¶ 73(f) DJ at 4, ¶ 8(a)(vi)	M
St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.	PI ¶ 73(g) DJ at 4, ¶ 8(a)(vii)	N
St. Luke's reported the parents to CPS.	PI ¶ 73(h) DJ at 4, ¶ 8(a)(viii)	O
Dr. Erickson threatened to file a report with CPS if the parents did not agree to the treatment plan between March 1 through March 4, 2022.	PI ¶ 73(i) DJ at 4, ¶ 8(a)(ix)	P
St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccination.	PI ¶ 73(j) DJ at 4, ¶ 8(a)(x)	Q
The family was discriminated against because the Infant was unvaccinated.	PI ¶ 73(k) DJ at 4, ¶ 9(a)(xi)	R
The parents have thousands of dollars of medical bills they have to pay based on the care provided by St. Luke's or any medical provider.	PI ¶ 73(l) DJ at 4, ¶ 9(a)(xii)	S
The parents did not consent to the medical treatment of the Infant.	PI ¶ 73(m) DJ at 4, ¶ 9(a)(xiii)	T
The Infant was released from the Children's Hospital and returned directly to the family due to the protesters' or Defendant's actions.	PI ¶ 73(n) DJ at 4, ¶ 9(a)(xiv)	U
Portraying Chris Roth, Natasha Erickson, or Tracy Jungman in a false light as a person that harms children.	PI ¶ 76	V

**Categories for past or future defamation/false light portrayals, and citations.**

Pre-PI defamation/false light portrayals	Post-PI defamation/false light portrayals	Applies to: Defendant or Defendant and agents
	Cease posting and disseminating defamatory statements against all Plaintiffs. PI Page 37, ¶ 1;	Defendants
	Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children. PI Page 37, ¶ 2; DJ at 4, ¶ 9(b)	Defendants



<u>Pre-PI</u> defamation/false light portrayals	<u>Post-PI</u> defamation/false light portrayals	Applies to: Defendant or Defendant and agents
Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children. PI Page 37, ¶ 3; DJ at 4-5, ¶ 9(c)		Defendants  Applies through Defendants to mandate removal of statements by agents ("Defendants have authority to do so"), whether the online sources are "controlled by Defendants (directly or indirectly)". PI Pp. 36; 39.
	Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman. PI Page 37, ¶ 4; DJ at 5, ¶ 9(d)	Defendants
Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. PI Page 37, ¶ 5; DJ at 6, ¶ 9€	Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. PI Page 37, ¶ 5; DJ at 6, ¶ 9€	Defendants  Applies through Defendants to mandate removal of statements by agents ("Defendants have authority to do so"), whether the online sources are "controlled by Defendants (directly or indirectly)". PI Pp. 36; 39.
Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light. PI Page 37, ¶ 6. *Note the DJ does not include the agent language. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light. DJ at 6, ¶ 9(f)		Defendants  Applies through Defendants to mandate removal of statements by agents ("Defendants have authority to do so"), whether the online sources are "controlled by Defendants (directly or indirectly)". PI Pp. 36; 39.



Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
B1	3/12/2022	Idaho CPS took Baby Cyrus	<a href="https://www.youtube.com/watch?v=MaRScsCK2i0">https://www.youtube.com/watch?v=MaRScsCK2i0</a>	10/12/2023	Removed by YouTube.		H, J
B2	3/12/2022	Transcript of Idaho CPS took Baby Cyrus [446] SLHS_0007776					H, J
B3	3/12/2022	They arrested baby Cyrus's mother last night too	<a href="https://www.youtube.com/watch?v=qpGQhQtdzw">https://www.youtube.com/watch?v=qpGQhQtdzw</a>	10/12/2023	Removed by YouTube.		J
B4	3/12/2022	Update on baby Cyrus	<a href="https://www.youtube.com/watch?v=UdEMKA1GfyY">https://www.youtube.com/watch?v=UdEMKA1GfyY</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=UdEMKA1GfyY">https://www.youtube.com/watch?v=UdEMKA1GfyY</a>	2/16/2024	H, J
B5	3/12/2022	Transcript of Update on baby Cyrus					H, J
B6	3/13/2022	Personal Accountability Works	<a href="https://www.youtube.com/watch?v=8sKpqtTiu-w">https://www.youtube.com/watch?v=8sKpqtTiu-w</a>	10/12/2023	Removed by YouTube.		J
B7	3/13/2022	Frightening update on baby Cyrus	<a href="https://www.youtube.com/watch?v=q_xwlay4mbU">https://www.youtube.com/watch?v=q_xwlay4mbU</a>	10/12/2023	Removed by YouTube.		H, I
B8	3/13/2022	Transcript of Frightening update on baby Cyrus					H, I
B9	3/13/2022	Baby Cyrus is worse now	<a href="https://www.youtube.com/watch?v=QmV6R2Du5t8">https://www.youtube.com/watch?v=QmV6R2Du5t8</a>	10/12/2023	Removed by YouTube.		H, I, J, N
B10	3/13/2022	Transcript of Baby Cyrus is worse now					H, I, J, N
B11	3/15/2022	Call to Action- Baby Cyrus, now or never	<a href="https://www.youtube.com/watch?v=Uo7j9CW7M">https://www.youtube.com/watch?v=Uo7j9CW7M</a>	10/12/2023	Removed by YouTube.		I, N
B12	3/15/2022	Transcript of Call to Action-Baby Cyrus, now or never					I, N
B13	3/15/2022	Emergency Message Cyrus - Go Back to the Hospital	<a href="https://www.youtube.com/watch?v=1FN9NBryiY">https://www.youtube.com/watch?v=1FN9NBryiY</a>	10/12/2023	Removed by YouTube.		J, U
B14	3/15/2022	Transcript of Emergency Message Cyrus - Go Back to the Hospital					J, U
B15	3/16/2022	Your children do not belong to you!	<a href="https://www.youtube.com/watch?v=gfMbo9BR2CE">https://www.youtube.com/watch?v=gfMbo9BR2CE</a>	10/12/2023	Removed by YouTube.		A, H
B16	3/16/2022	Transcript of Your children do not belong to you!					A, H
B17	3/18/2022	Baby Cyrus Was Returned Home Today!!	<a href="https://www.youtube.com/watch?v=wS2b9UR8DQM">https://www.youtube.com/watch?v=wS2b9UR8DQM</a>	10/12/2023	Removed by YouTube.		U
B18	3/18/2022	Transcript of Baby Cyrus Was Returned Home Today!!					U
B19	9/7/2022	Ammon Bundy Facebook Live St. Luke's is Suing Me	<a href="https://www.facebook.com/realammonbundy/videos/423278493120502">https://www.facebook.com/realammonbundy/videos/423278493120502</a>	10/12/2023	<a href="https://www.facebook.com/realammonbundy/videos/423278493120502">https://www.facebook.com/realammonbundy/videos/423278493120502</a>	2/16/2024	H, I, N, P, Q, R, U
B20	9/7/2022	Transcript of Ammon Bundy Facebook Live St. Luke's is Suing Me					H, I, N, P, Q, R, U
B21	9/9/2022	Why the PRIDE movement is so strong in Idaho	<a href="https://www.youtube.com/watch?v=jRplVGvPzI">https://www.youtube.com/watch?v=jRplVGvPzI</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=jRplVGvPzI">https://www.youtube.com/watch?v=jRplVGvPzI</a>	2/16/2024	M
B22	12/31/2022	Chris Roth with St Luke's is suing me for speaking about their participation in taking baby Cyrus	<a href="https://www.youtube.com/watch?v=GqIEip6jw_g">https://www.youtube.com/watch?v=GqIEip6jw_g</a>	10/12/2023	Removed by YouTube.		
B23	2/10/2023	St. Lukes Hospital Executives Seek \$7.5 Million & My Arrest	<a href="https://www.youtube.com/watch?v=R6Asy1zB1oE">https://www.youtube.com/watch?v=R6Asy1zB1oE</a>	10/12/2023	Removed by YouTube.		C, K
B24	2/10/2023	Transcript of St. Lukes Hospital Executives Seek \$7.5 Million & My Arrest					C, K
B25	4/19/2023	I'll give you everything I own. Message to Chris Roth & Erik Stidham	<a href="https://www.youtube.com/watch?v=lgSRID0xGZY">https://www.youtube.com/watch?v=lgSRID0xGZY</a>	10/12/2023	Removed by YouTube.		K
B26	4/20/2023	Is being free a crazy thought	<a href="https://www.youtube.com/watch?v=IcrDbK8vlis&amp;t=162s">https://www.youtube.com/watch?v=IcrDbK8vlis&amp;t=162s</a>	10/12/2023	Removed by YouTube.		K, O
B27	4/26/2023	2023-04-26_Blessed with so many good friends!	<a href="https://www.youtube.com/watch?v=mPPvXYTCbnM">https://www.youtube.com/watch?v=mPPvXYTCbnM</a>	10/12/2023	Removed by YouTube.		O
B28	4/27/2023	2023-04-27 CEO Chris Roth My Offer Still Stands	<a href="https://www.youtube.com/watch?v=NoSTYmrYC_g">https://www.youtube.com/watch?v=NoSTYmrYC_g</a>	10/12/2023	Removed by YouTube.		A, C, O, V
B29	5/8/2023	I don't mind being called a radical_screencapture-youtube-watch-2023-05-08-10_51_37	<a href="https://www.youtube.com/watch?v=NcgqTs9AZXo">https://www.youtube.com/watch?v=NcgqTs9AZXo</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=NcgqTs9AZXo">https://www.youtube.com/watch?v=NcgqTs9AZXo</a>	2/16/2024	A, C
B31	5/22/2023	2023-05-22 It's Happening Everywhere!	<a href="https://www.youtube.com/watch?v=zy_c9D5CjQQ">https://www.youtube.com/watch?v=zy_c9D5CjQQ</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=zy_c9D5CjQQ">https://www.youtube.com/watch?v=zy_c9D5CjQQ</a>	2/16/2024	U
B32	5/22/2023	2023-05-22 This Could Happen to You!	<a href="https://www.youtube.com/watch?v=ToLyf6XW7r0&amp;t=5s">https://www.youtube.com/watch?v=ToLyf6XW7r0&amp;t=5s</a>	10/12/2023			A, C, N, U
B33	5/22/2023	2023-05-22 SAVING BABY CYRUS	<a href="https://www.youtube.com/watch?v=q84r7l8hqvA">https://www.youtube.com/watch?v=q84r7l8hqvA</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=q84r7l8hqvA">https://www.youtube.com/watch?v=q84r7l8hqvA</a>	2/16/2024	O, P
B34	8/28/2023	God told me to stay and fight in Idaho!	<a href="https://www.youtube.com/watch?v=ZV7aycfZGz8">https://www.youtube.com/watch?v=ZV7aycfZGz8</a>	10/12/2023	Removed by YouTube.		A, C, I, J, N, U
B35	9/12/2023	The saddest thing I have seen in a long time	<a href="https://www.youtube.com/watch?v=GzC5fYUnFPM">https://www.youtube.com/watch?v=GzC5fYUnFPM</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=GzC5fYUnFPM">https://www.youtube.com/watch?v=GzC5fYUnFPM</a>	2/16/2024	J
B36	9/13/2023	Will They Kill to Silence - Is this Really about Defamation?	<a href="https://www.youtube.com/watch?v=UpWmjOTIKrl">https://www.youtube.com/watch?v=UpWmjOTIKrl</a>	10/12/2023	Removed by YouTube.		H, I, K, N, O, P, V
B37	9/13/2023	Transcript of Will They Kill to Silence - Is this Really about Defamation?					H, I, K, N, O, P, V
B38	9/29/2023	Oh boy, do I have some information for you!	<a href="https://www.youtube.com/watch?v=4dA4Ifq7da0">https://www.youtube.com/watch?v=4dA4Ifq7da0</a>	10/12/2023	Removed by YouTube.		U
B39	10/6/2023	Judges, Lawyers & Bureaucrats are destroying this country!	<a href="https://www.youtube.com/watch?v=xYyDUfch0vU">https://www.youtube.com/watch?v=xYyDUfch0vU</a>	10/12/2023	Removed by YouTube.		A, G, J,
B40	10/6/2023	Transcript of Judges, Lawyers & Bureaucrats are destroying this country!					A, G, J,
B41	10/6/2023	Spreaker_Larry Klayman_Govt Corruption Takes Sinister Turn w Child - 00_13_53.99 - 00_40_00.68	<a href="https://www.spreaker.com/user/10617621/sep-16-17_1">https://www.spreaker.com/user/10617621/sep-16-17_1</a>	10/12/2023	<a href="https://www.spreaker.com/episode/government-corruption-takes-sinister-turn-with-child-57131109">https://www.spreaker.com/episode/government-corruption-takes-sinister-turn-with-child-57131109</a>	2/16/2024	A, I, J, U
B42	10/6/2023	2023-10-06 Spreaker_Larry Klayman_Govt Corruption Takes Sinister Turn w Child - 00_13_53.99 - 00_40_00.68	<a href="https://www.spreaker.com/user/10617621/sep-16-17_1">https://www.spreaker.com/user/10617621/sep-16-17_1</a>	10/12/2023	<a href="https://www.spreaker.com/episode/government-corruption-takes-sinister-turn-with-child-57131109">https://www.spreaker.com/episode/government-corruption-takes-sinister-turn-with-child-57131109</a>	2/16/2024	A, I, J, U
B43	10/19/2023	2023-10-19 Joe Oltmann Live with Ammon Bundy: Evil Targets the Best of Men - Biden Admin Embarrasses US With Treatment of Israel Conflict	<a href="https://rumble.com/v3q8941-19-october-2023-joe-oltmann-live-12pm-est.html">https://rumble.com/v3q8941-19-october-2023-joe-oltmann-live-12pm-est.html</a>	10/20/2023	<a href="https://rumble.com/v3q8941-19-october-2023-joe-oltmann-live-12pm-est.html">https://rumble.com/v3q8941-19-october-2023-joe-oltmann-live-12pm-est.html</a>	2/16/2024	A, J, O, P, T, U

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
B44	1/6/2024	No wonder the Idaho establishment tried to silence Ammon Bundy  The Idaho good old boys make millions off of children sex change surgeries. They are pushing a transgender/homosexual agenda in Idaho. I have exposed these people many times and they hate me for it. So, they use the liberal courts to financially destroy and try and silence me. Here is a good example of what I do to make them so motivated to silence me.  St. Lukes ordered Youtube to take this video down once, we did some minor editing to satisfy Youtube and reposted it.  Long live the truth!			<a href="https://www.youtube.com/watch?v=c3pyErrj08&amp;t=4s">https://www.youtube.com/watch?v=c3pyErrj08&amp;t=4s</a>	2/20/2024	Removed by YouTube.
B45	1/7/2024	\$250,000 warrant was issued for publishing this video!  Idaho Judge, Nancy Baskin, issued a \$250,000 warrant for Ammon Bundy's arrest for publishing this video and others like it.  The Idaho good old boys will do just about anything to silence those who oppose their authoritarian agenda. They believe they have the power to take anything the wish away, including babies from parents.  Youtube was ordered by St. Luke's attorney to take this video down. After making minor edits to satisfy YouTube we republished it.  Long Live the Truth!			<a href="https://www.youtube.com/watch?v=i2CNnyZG-T8&amp;t=10s">https://www.youtube.com/watch?v=i2CNnyZG-T8&amp;t=10s</a>	2/20/2024	Removed by YouTube.
B46	1/8/2024	They took a baby, got paid and lied about it!  CPS Agents, Meriden Police, St. Lukes Medical Staff FLAT-OUT lied about why they took Baby Cyrus. Here is the evidence. Then they got their attorneys to try and cover it all up using the courts.  Youtube was ordered by St. Luke's attorney to take this video down. After making minor edits to satisfy YouTube we republished it.  Long Live the Truth!			<a href="https://www.youtube.com/watch?v=0LufO632o70&amp;t=7s">https://www.youtube.com/watch?v=0LufO632o70&amp;t=7s</a>	2/20/2024	Removed by YouTube.
B47	1/9/2024	Our officers will kill you if you don't shut up! A Banana Republic....  St. Luke's controls IACI and IACI controls the Idaho government. They have taken Ammon's home, driven him from Idaho and put a \$250,000 warrant out for his arrest. The police in Idaho will kill Ammon or Diego if they do not comply with silence. St. Lukes and the Good Old Boys of Idaho have become a Banana Republic.  This video gives compelling evidence that St. Lukes executives and staff were not defamed but will use any force necessary to silence Bundy and Rodriguez.			<a href="https://www.youtube.com/watch?v=aal8TmauA0E">https://www.youtube.com/watch?v=aal8TmauA0E</a>	2/20/2024	Removed by YouTube.
B48	2/17/2024	They took a baby from loving parents because they missed one doctors appointment  Your child or grand child gets sick, you are doing all you can to care for him but a doctor calls Child Protection Services because you miss a medical appointment. CPS uses this missing a medical appointment to take your child away and the police comes in force and rips your child from your arms. This could happen to anyone.			<a href="https://www.youtube.com/watch?v=t5HDyVIMiMIA">https://www.youtube.com/watch?v=t5HDyVIMiMIA</a>	2/20/2024	H, J, K, N, O, U
B49	2/20/2024	Want to know where Ammon Bundy is?			<a href="https://www.youtube.com/watch?v=6Yf4Wgd8sig">https://www.youtube.com/watch?v=6Yf4Wgd8sig</a>	2/20/2024	J, K
B50	2/27/2024	This is what political corruption looks like! Everyone knows that the BLM (Bureau of Land Management) and the FBI hate the Bundy's. So why was Judge Lynn Norton assigned to preside over the St. Luke's lawsuit? Also why was the FBI behind the scenes manipulating St. Luke's after Baby Cyrus was taken?			<a href="https://www.youtube.com/watch?v=J1rJogfCjdlM">https://www.youtube.com/watch?v=J1rJogfCjdlM</a>	3/8/2024	J, K
B51	3/3/2024	I will give you \$10,000 cash!			<a href="https://www.youtube.com/watch?v=Pa6U78z5FTA&amp;t=1s">https://www.youtube.com/watch?v=Pa6U78z5FTA&amp;t=1s</a>	3/9/2024	J, K

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
B52	3/18/2024	\$10,000 is still up for grabs			<a href="https://www.youtube.com/watch?v=xI7dnLACawQ">https://www.youtube.com/watch?v=xI7dnLACawQ</a>	3/26/2024	J, K



Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
C1	3/12/2022	Team Vote Bundy Campaign News: Baby Cyrus was Kidnapped!!!	<a href="https://team.votebundy.com/news_view?/baby-cyrus-was-kidnapped&amp;id=07a42730-c674-421a-a5dd-66d25464089b">https://team.votebundy.com/news_view?/baby-cyrus-was-kidnapped&amp;id=07a42730-c674-421a-a5dd-66d25464089b</a>	10/12/2023	<a href="https://team.votebundy.com/news_view?/baby-cyrus-was-kidnapped&amp;id=07a42730-c674-421a-a5dd-66d25464089b">https://team.votebundy.com/news_view?/baby-cyrus-was-kidnapped&amp;id=07a42730-c674-421a-a5dd-66d25464089b</a>	2/16/2024	A, J
C2	3/28/2022	2022-04-08 AM1139 Was Helping Baby Cyrus Come Home an Appropriate thing to do as a Candidate for Governor?	<a href="https://team.votebundy.com/news_view?/was-helping-baby-cyrus-come-home-an-appropriate-thing-to-do-as-a-candidate-for-governor&amp;id=517352db-0a74-4b1f-aa5e-d57bc5bde11c">https://team.votebundy.com/news_view?/was-helping-baby-cyrus-come-home-an-appropriate-thing-to-do-as-a-candidate-for-governor&amp;id=517352db-0a74-4b1f-aa5e-d57bc5bde11c</a>	10/12/2023	<a href="https://team.votebundy.com/news_view?/was-helping-baby-cyrus-come-home-an-appropriate-thing-to-do-as-a-candidate-for-governor&amp;id=517352db-0a74-4b1f-aa5e-d57bc5bde11c">https://team.votebundy.com/news_view?/was-helping-baby-cyrus-come-home-an-appropriate-thing-to-do-as-a-candidate-for-governor&amp;id=517352db-0a74-4b1f-aa5e-d57bc5bde11c</a>	2/16/2024	U
C3	5/20/2022	Critical Disclosure Radio Northwest Liberty News_Ammon Bundy_Live [180]_SLHS_0022797	<a href="https://rumble.com/v15cvl3-cd-radio-ammon-bundy-idaho-gubernatorial-candidate-live.html?mref=9fcq3&amp;mc=ey69l">https://rumble.com/v15cvl3-cd-radio-ammon-bundy-idaho-gubernatorial-candidate-live.html?mref=9fcq3&amp;mc=ey69l</a>	10/16/2023	<a href="https://rumble.com/v15cvl3-cd-radio-ammon-bundy-idaho-gubernatorial-candidate-live.html?mref=9fcq3&amp;mc=ey69l">https://rumble.com/v15cvl3-cd-radio-ammon-bundy-idaho-gubernatorial-candidate-live.html?mref=9fcq3&amp;mc=ey69l</a>	2/16/2024	U
C4	5/25/2022	Ammon Bundy Remains a Candidate for Governor of Idaho	<a href="https://rumble.com/v1669un-ammon-bundy-remains-a-candidate-for-governor-of-idaho-5.25.22.html">https://rumble.com/v1669un-ammon-bundy-remains-a-candidate-for-governor-of-idaho-5.25.22.html</a>	10/16/2023	<a href="https://rumble.com/v1669un-ammon-bundy-remains-a-candidate-for-governor-of-idaho-5.25.22.html?mref=9fcq3&amp;mrefc=2">https://rumble.com/v1669un-ammon-bundy-remains-a-candidate-for-governor-of-idaho-5.25.22.html?mref=9fcq3&amp;mrefc=2</a>	2/16/2024	U
C5	8/17/2022	Stand Up for Idaho – Weekly Meeting Presentation	<a href="https://odysee.com/\$/embed/10-17/95e986e5754ce95f4869e0a6bd284e3713572f64?r=CF9cekGhEioDN1nX5YZxmSYd4H2DkRnN">https://odysee.com/\$/embed/10-17/95e986e5754ce95f4869e0a6bd284e3713572f64?r=CF9cekGhEioDN1nX5YZxmSYd4H2DkRnN</a>	10/16/2023	<a href="https://odysee.com/\$/embed/10-17/95e986e5754ce95f4869e0a6bd284e3713572f64?r=CF9cekGhEioDN1nX5YZxmSYd4H2DkRnN">https://odysee.com/\$/embed/10-17/95e986e5754ce95f4869e0a6bd284e3713572f64?r=CF9cekGhEioDN1nX5YZxmSYd4H2DkRnN</a>	2/16/2024	U
C6	9/8/2022	2022-09-08 Hospital Suing_screencapture-team-votebundy-news-view-2023-10-02-14_48_54	<a href="https://www.votebundy.com/media/videos/?watch=st-luke-s-hospital-is-suing-me-why-i-m-not-participating-in-the-court-process">https://www.votebundy.com/media/videos/?watch=st-luke-s-hospital-is-suing-me-why-i-m-not-participating-in-the-court-process</a>	10/12/2023	Imbedded video removed by YouTube.	2/16/2024	H, I, N, P, Q, R, U,
C7		Interviews links	<a href="https://www.votebundy.com/media/interviews/">https://www.votebundy.com/media/interviews/</a>	10/12/2023	<a href="https://www.votebundy.com/media/interviews/">https://www.votebundy.com/media/interviews/</a>	2/16/2024	U

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D1	3/14/2022	We must get baby Cyrus home to his loving family! This little guy and his family are worth fighting for! #savebabycyrus	<a href="https://www.facebook.com/profile/100069215139627/search/?q=baby%20Cyrus">https://www.facebook.com/profile/100069215139627/search/?q=baby%20Cyrus</a>	10/16/2023	<a href="https://www.facebook.com/profile/100069215139627/search/?q=baby%20Cyrus">https://www.facebook.com/profile/100069215139627/search/?q=baby%20Cyrus</a>	2/16/2024	H, I
D2	3/16/2022	Cyrus Update: Yesterday's hearing was moved to today. Please support at the Ada County Court house at noon. This hearing will determine if Cyrus goes home or not. We are also asking people to be at the hospital (Boise St. Luke's) between 10 AM and 8 PM. There are other locations such as the CPS agents house and Officer Hansen's house that we will be maintaining a presence at as well.	<a href="https://www.facebook.com/profile/100069215139627/search/?q=Cyrus%20update">https://www.facebook.com/profile/100069215139627/search/?q=Cyrus%20update</a>	10/16/2023	<a href="https://www.facebook.com/profile/100069215139627/search/?q=Cyrus%20update">https://www.facebook.com/profile/100069215139627/search/?q=Cyrus%20update</a>	2/16/2024	A
D3	3/17/2022	Press conference about Baby Cyrus March 17, 2022	<a href="https://www.facebook.com/profile/100069215139627/search/?q=Press%20conference">https://www.facebook.com/profile/100069215139627/search/?q=Press%20conference</a>	10/16/2023	<a href="https://www.facebook.com/profile/100069215139627/search/?q=Press%20conference">https://www.facebook.com/profile/100069215139627/search/?q=Press%20conference</a>	2/16/2024	A, B, C, K
D4	3/18/2022	There is a celebration outside of the Dept of Health and Wellness right now! Thank you to the many people who dropped what they were doing this week and came out day after day to support the Anderson family and baby Cyrus. #savebabycyrus	<a href="https://www.facebook.com/profile/100069215139627/search/?q=celebration%20outside">https://www.facebook.com/profile/100069215139627/search/?q=celebration%20outside</a>	10/16/2023	<a href="https://www.facebook.com/profile/100069215139627/search/?q=celebration%20outside">https://www.facebook.com/profile/100069215139627/search/?q=celebration%20outside</a>	2/16/2024	H, I
D5	9/7/2022	St. Luke's hospital is suing me. Why I am not participating in the court process. The CEO of St. Luke's Hospital makes \$8.2 million dollars annually and he is saying that I financially hurt him.	<a href="https://fb.watch/nN4nwj03jc/">https://fb.watch/nN4nwj03jc/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/423278493120502/">https://www.facebook.com/realammonbundy/videos/423278493120502/</a>	2/16/2024	H, I, J, R, O, U,
D6	2/11/2023	St. Lukes hospital executives are: - Seeking 7.5 million in punitive damages from Diego and I, - Seeking to have me arrested & fined, - Committing horrible crimes against children in Idaho, - Using the courts to silence anyone who may tell the truth about what they are doing.	<a href="https://fb.watch/nN1ykH6nj2/">https://fb.watch/nN1ykH6nj2/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/500483205574951/">https://www.facebook.com/realammonbundy/videos/500483205574951/</a>	2/16/2024	C, K, V
D7	2/11/2023	St. Lukes hospital executives are Seeking 7.5 million in punitive damages	<a href="https://www.facebook.com/realammonbundy/videos/500483205574951">https://www.facebook.com/realammonbundy/videos/500483205574951</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/500483205574951">https://www.facebook.com/realammonbundy/videos/500483205574951</a>	2/16/2024	C, K, V
D8	4/27/2023	Chris Roth (CEO of St. Luke's), my offer still stands. My offer to give you everything I own has not changed. However, I do want to make it clear that it's in exchange for you giving me peace. I will not give you everything I own and my freedom. Sharing YouTube video.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	J, O
D9	4/27/2023	CEO Chris Roth My Offer Still Stands My offer to give you everything I own has not changed. However, I do want to make it clear that it's in exchange for you giving me peace. I will not give you everything I own and my freedom. 👉👉	<a href="https://www.youtube.com/watch?v=NOsTYmrYC_g">https://www.youtube.com/watch?v=NOsTYmrYC_g</a>	10/16/2023	Post is still up - imbedded video removed by YouTube.		J, O
D10	4/28/2023	The Pete Santilli Show with special guest Ammon Bundy: St. Luke's Hospital Is Trying To Destroy The People's Rights Network by Destroying Ammon Bundy. Thanks for having me on, Pete!	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	J, H, O, P, T
D11	4/30/2023	Had a great time on the Nate Shelman Show last week speaking with Jim Smith about the ongoing harassment I have endured by St. Luke's and attorney Erik Stidham. Please listen to learn of the truth the mainstream media will never tell you.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	J, U, I, N, O, T,
D12	5/3/2023	I joined Sam Bushman on Liberty Roundtable to discuss the facts about the Baby Cyrus story and the St. Luke's lawsuit. Listen to the full discussion here <a href="https://www.libertyroundtable.com/.../radio-show-hour-2.../">https://www.libertyroundtable.com/.../radio-show-hour-2.../</a>	<a href="https://fb.watch/nN49EJ0UXR/">https://fb.watch/nN49EJ0UXR/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/780066473629332/">https://www.facebook.com/realammonbundy/videos/780066473629332/</a>	2/16/2024	A, B, C, H, M, O, P, S, U
D13	5/3/2023	Sam Bushman Liberty Roundtable with Ammon Bundy	<a href="https://fb.watch/nKs-wjw9-j/">https://fb.watch/nKs-wjw9-j/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/780066473629332/">https://www.facebook.com/realammonbundy/videos/780066473629332/</a>	2/16/2024	A, B, C, H, M, O, P, S, U
D14	5/6/2023	Here is proof that St. Luke's KNEW that Baby Cyrus was not in imminent danger the night he was taken. Yet they kept him from his mother (his only source of nutrition) anyways. The State of Idaho has admitted they were wrong, returned Cyrus and dropped all charges against the family. Why won't St. Luke's admit they were wrong and drop the lawsuit? Sharing YouTube video.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	Post is still up - imbedded video removed by YouTube.	2/16/2024	A, B, J, H, M
D15	5/8/2023	If you want to hear all of the accurate details from the Baby Cyrus case, including some that have never been shared before, be sure to join this virtual live town hall event this Wednesday, May 10th. Government Subsidized Child Trafficking	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	A
D16	5/9/2023	Great discussion with Stew Peters about the Baby Cyrus case and the St. Luke's lawsuit. us Watch the full video here: <a href="https://rumble.com/v2mxiyy-idaho-judge-targets-ammon...">https://rumble.com/v2mxiyy-idaho-judge-targets-ammon...</a>	<a href="https://fb.watch/nN47lo1HHv/">https://fb.watch/nN47lo1HHv/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/233683385924261/">https://www.facebook.com/realammonbundy/videos/233683385924261/</a>	2/16/2024	J, U

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
D17	5/9/2023	Great discussion with Stew Peters about the Baby Cyrus case and the St. Luke's lawsuit. us Watch the full video here: <a href="https://rumble.com/v2mxlyy-idaho-judge-targets-ammon...">https://rumble.com/v2mxlyy-idaho-judge-targets-ammon...</a>	<a href="https://fb.watch/nJrmPWEbU/">https://fb.watch/nJrmPWEbU/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/233683385924261/">https://www.facebook.com/realammonbundy/videos/233683385924261/</a>	2/16/2024	J, U
D18	5/10/2023	You won't want to miss this! Happening TODAY — May 10th! If you want to hear all of the accurate details from the Baby Cyrus case, including some that have never been shared before, be sure to join this virtual live town hall event this Wednesday, May 10th. Government Subsidized Child Trafficking.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	A
D19	5/11/2023	In case you missed it, the Baby Cyrus presentation has been recorded and is now live: <a href="https://www.freedomman.org/.../government-subsidized.../">https://www.freedomman.org/.../government-subsidized.../</a>	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	A, B, C, E, M, R, Q, T, V, S, J, U, H
D20	5/12/2023	Bryan Hyde shares insight about the St. Luke's lawsuit and the Baby Cyrus story. Thanks Bryan! Sharing Bryan Hyde Rumble video.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	A, H,
D21	5/15/2023	Letter to Erik Stidham (St. Lukes Lead Attorney) from Ammon Bundy — If I do not have the right to publish and speak about what the evidence shows happened to baby Cyrus, then what right do I have to speak at all? <a href="https://twitter.com/realabundy/status/1658179708767330319...">https://twitter.com/realabundy/status/1658179708767330319...</a>	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	P
D22	5/19/2023	It's like David & Goliath, quick but detailed update video on the Ammon Bundy/St. Lukes case. Thanks Bryan Hyde! YouTube: <a href="https://youtu.be/rogmvpoCOEw">https://youtu.be/rogmvpoCOEw</a>	<a href="https://fb.watch/nN44Ajb3P/">https://fb.watch/nN44Ajb3P/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/546541844347607/">https://www.facebook.com/realammonbundy/videos/546541844347607/</a>	2/16/2024	P
D23	5/19/2023	It's like David & Goliath, quick but detailed update video on the Ammon Bundy/St. Lukes case. Thanks Bryan Hyde! YouTube: <a href="https://youtu.be/rogmvpoCOEw">https://youtu.be/rogmvpoCOEw</a>	<a href="https://fb.watch/nJqup_CDyt/">https://fb.watch/nJqup_CDyt/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/546541844347607/">https://www.facebook.com/realammonbundy/videos/546541844347607/</a>	2/16/2024	P
D24	5/23/2023	One visit to the doctor and the Anderson's happy life of joy and love turned into their worst nightmare. It is too easy for our children to be taken away. Thankfully the Andersons had people that stood and fought until their family was reunited. This could happen to anybody, don't be alone when it does. Join today! Text "RIGHTS" to 80123 or visit the website	<a href="https://fb.watch/nN43TcXX7R/">https://fb.watch/nN43TcXX7R/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/1597777244032999/">https://www.facebook.com/realammonbundy/videos/1597777244032999/</a>	2/16/2024	O, U
D25	5/23/2023	One visit to the doctor and the Anderson's happy life of joy and love turned into their worst nightmare. It is too easy for our children to be taken away. Thankfully the Andersons had people that stood and fought until their family was reunited. This could happen to anybody, don't be alone when it does. Join today! Text "RIGHTS" to 80123 or visit the website	<a href="https://fb.watch/nJqjC-fIMq/">https://fb.watch/nJqjC-fIMq/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/1597777244032999/">https://www.facebook.com/realammonbundy/videos/1597777244032999/</a>	2/16/2024	O, U
D26	5/24/2023	Due to the Andersons being part of the Peoples Rights Network, neighbors united in defense of the family, and baby Cyrus was returned to his parents in 6 days. Ammon Bundy and Diego Rodriguez continue to face lawsuits and arrest, as the People's Rights Network stands between them and wrongful government persecution. This could happen to anybody, don't be alone when it does. Join today - text "RIGHTS" to 80123 or visit the website.	<a href="https://fb.watch/nN43c9CQqY/">https://fb.watch/nN43c9CQqY/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/638436311122179/">https://www.facebook.com/realammonbundy/videos/638436311122179/</a>	2/16/2024	O, U, P
D27	5/24/2023	Due to the Andersons being part of the Peoples Rights Network, neighbors united in defense of the family, and baby Cyrus was returned to his parents in 6 days. Ammon Bundy and Diego Rodriguez continue to face lawsuits and arrest, as the People's Rights Network stands between them and wrongful government persecution. This could happen to anybody, don't be alone when it does. Join today - text "RIGHTS" to 80123 or visit the website.	<a href="https://fb.watch/nJnWijk6TO/">https://fb.watch/nJnWijk6TO/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/638436311122179/">https://www.facebook.com/realammonbundy/videos/638436311122179/</a>	2/16/2024	O, U, P
D28	5/25/2023	WATCH: The TRUTH about Ammon Bundy, the case of Baby Cyrus, and the CORRUPT system attempting to CRUSH anyone who stands up against them! Sharing Saving Baby Cyrus video.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	O, U, P
D29	5/25/2023	WATCH: The TRUTH about Ammon Bundy, the case of Baby Cyrus, and the CORRUPT system attempting to CRUSH anyone who stands up against them! Sharing Saving Baby Cyrus video.	<a href="https://www.facebook.com/realammonbundy/videos/638436311122179">https://www.facebook.com/realammonbundy/videos/638436311122179</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/638436311122179">https://www.facebook.com/realammonbundy/videos/638436311122179</a>	2/16/2024	O, U, P

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
D30	5/27/2023	This time last year, Diego and I celebrated CPS' reluctant return of Diego's grandson Cyrus. However, since then we have been hunted like the early day reformers and are now both fugitives of the law. All because we would not stay silent about the wrongful taking of baby Cyrus. We are now in a new stage of deterioration in the legal process where our children can be taken and if we don't shut up about it powerful institutions will use the force of law to punish us.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	
D31	5/30/2023	St. Luke was a doctor; a healer. Hospitals all around the world use his name for their medical facilities. Baby Cyrus, his mother, and his father went there for help and it ended up being a nightmare. This isn't what St. Luke would have wanted. Hospitals were meant to help, not hurt	<a href="https://fb.watch/nN40RcC9iB/">https://fb.watch/nN40RcC9iB/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/3684906968411229/">https://www.facebook.com/realammonbundy/videos/3684906968411229/</a>	2/16/2024	O
D32	5/30/2023	St. Luke was a doctor; a healer. Hospitals all around the world use his name for their medical facilities. Baby Cyrus, his mother, and his father went there for help and it ended up being a nightmare. This isn't what St. Luke would have wanted. Hospitals were meant to help, not hurt	<a href="https://fb.watch/nJpbRBL8P4/">https://fb.watch/nJpbRBL8P4/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/3684906968411229/">https://www.facebook.com/realammonbundy/videos/3684906968411229/</a>	2/16/2024	O
D33	6/1/2023	The Cost For Liberty— Ammon Bundy and Eric Moutsos discuss how deep the deep state will really go to silence those who stand up and expose their corrupt system. The story of Baby Cyrus is just the tip of the iceberg of how unbelievably evil these people who are supposed to be serving and protecting us can be.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	A, B, O, P, U
D34	6/13/2023	Update from June 7, 2023	<a href="https://fb.watch/nN3_QMUzX/">https://fb.watch/nN3_QMUzX/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/970916330849924/">https://www.facebook.com/realammonbundy/videos/970916330849924/</a>	2/16/2024	I, K, O
D35	6/13/2023	Update from June 7, 2023	<a href="https://fb.watch/nJnnnIHQV/">https://fb.watch/nJnnnIHQV/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/970916330849924/">https://www.facebook.com/realammonbundy/videos/970916330849924/</a>	2/16/2024	I, K, O
D36	6/17/2023	St. Luke's, one of the largest institutions in Idaho, has civilly sued me because they didn't like what I said when Baby Cyrus was taken. What started out as a \$50,000 judgement has now increased to an egregious amount of \$7.5 million. Interview with Bryan Hyde	<a href="https://fb.watch/nN3Zr_2mkp/">https://fb.watch/nN3Zr_2mkp/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/224720126694914/">https://www.facebook.com/realammonbundy/videos/224720126694914/</a>	2/16/2024	O
D37	6/17/2023	St. Luke's, one of the largest institutions in Idaho, has civilly sued me because they didn't like what I said when Baby Cyrus was taken. What started out as a \$50,000 judgement has now increased to an egregious amount of \$7.5 million. Interview with Bryan Hyde	<a href="https://fb.watch/nJl5U8Z8Bg/">https://fb.watch/nJl5U8Z8Bg/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/224720126694914/">https://www.facebook.com/realammonbundy/videos/224720126694914/</a>	2/16/2024	O
D38	6/25/2023	St. Luke's CEO Chris Roth just billed Diego and I \$18,103.50 because we appealed to the federal courts.	<a href="https://fb.watch/nN3Y-4FK_b/">https://fb.watch/nN3Y-4FK_b/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/1232164217475193/">https://www.facebook.com/realammonbundy/videos/1232164217475193/</a>	2/16/2024	A
D39	6/25/2023	St. Luke's CEO Chris Roth just billed Diego and I \$18,103.50 because we appealed to the federal courts.	<a href="https://fb.watch/nJk-q8hB5k/">https://fb.watch/nJk-q8hB5k/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/1232164217475193/">https://www.facebook.com/realammonbundy/videos/1232164217475193/</a>	2/16/2024	A
D40	7/10/2023	Letter to Judge Baskin from Ammon Bundy linking to Twitter and People's Rights Network letter	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	U, T
D41	7/18/2023	If they didn't steal Baby Cyrus, none of this would have happened.	<a href="https://fb.watch/nN3WxfRRDD/">https://fb.watch/nN3WxfRRDD/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/223367484011343/">https://www.facebook.com/realammonbundy/videos/223367484011343/</a>	02/16/2024	J, O
D42	7/18/2023	If they didn't steal Baby Cyrus, none of this would have happened.	<a href="https://fb.watch/nJkIYB5Rvu/">https://fb.watch/nJkIYB5Rvu/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/videos/223367484011343/">https://www.facebook.com/realammonbundy/videos/223367484011343/</a>	2/16/2024	J, O
D43	7/24/2023	Massive institutions combined with the state, financially benefitting when they take a child is one of the worst combinations a parent can imagine. Therefore, to counter, the cost of stealing a baby must be extremely high and good people must assure strong consequences when it happens. Idaho CPS agents, Meridian police & St. Luke's staff so far have gotten off easy. They may have the means to use the courts to cover for their actions, but taking a baby from loving parents no matter how they abuse the courts is wrong and should never happen! People in a jury deciding how much St. Luke's is going to take from those who exposed the truth about them is a mockery to justice. When a baby is born he or she does not become property of the state or hospital executives. CPS agents, Meridian Police Officers and St. Luke's staff would do well to remember that. Sharing Evidence that CPS Agents, Meridian Police & St Lukes Staff are Lying about why they took Baby Cyrus video.	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	J, O, N
D44	7/24/2023	Evidence that CPS Agents, Meridian Police & St Lukes Staff are Lying about why they took Baby Cyrus video.	<a href="https://www.youtube.com/watch?v=T04KV7Ds6EA">https://www.youtube.com/watch?v=T04KV7Ds6EA</a>	10/16/2023	Post is still up - imbedded video removed by YouTube.		J, O, N



Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
D45	7/29/2023	St. Luke's Children's Hospital webpage is still advertising minor hormone therapy and sex change surgeries. This video gives proof.	<a href="https://fb.watch/nN3URbLeDK/">https://fb.watch/nN3URbLeDK/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/318255970632409/">https://www.facebook.com/realammonbundy/video/s/318255970632409/</a>	2/16/2024	J
D46	7/29/2023	St. Luke's Children's Hospital webpage is still advertising minor hormone therapy and sex change surgeries. This video gives proof.	<a href="https://fb.watch/nJehnMho2Z/">https://fb.watch/nJehnMho2Z/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/318255970632409/">https://www.facebook.com/realammonbundy/video/s/318255970632409/</a>	2/16/2024	J
D47	8/9/2023	St. Luke's executives, lawyers & witnesses lied to the jury many times. Here are a few examples of them lying to the jury...	<a href="https://fb.watch/nN3SLTiHNq/">https://fb.watch/nN3SLTiHNq/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/1029276958253272/">https://www.facebook.com/realammonbundy/video/s/1029276958253272/</a>	2/16/2024	U
D48	8/9/2023	St. Luke's executives, lawyers & witnesses lied to the jury many times. Here are a few examples of them lying to the jury...	<a href="https://fb.watch/nJdsmZzziz/">https://fb.watch/nJdsmZzziz/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/1029276958253272/">https://www.facebook.com/realammonbundy/video/s/1029276958253272/</a>	2/16/2024	U
D49	8/12/2023	Please watch: This is why Ammon Bundy was arrested.	<a href="https://fb.watch/nN3RZAH_Fc/">https://fb.watch/nN3RZAH_Fc/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/293771840004545/">https://www.facebook.com/realammonbundy/video/s/293771840004545/</a>	2/16/2024	O, U, P
D50	8/12/2023	Please watch: This is why Ammon Bundy was arrested.	<a href="https://fb.watch/nJdJMVs9IK/">https://fb.watch/nJdJMVs9IK/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/293771840004545/">https://www.facebook.com/realammonbundy/video/s/293771840004545/</a>	2/16/2024	O,U,P
D51	8/13/2023	I made it home on a \$10,000 bond. Thanks for all the prayers. I wonder if they will ever leave my family alone? This could happen to you...	<a href="https://fb.watch/nN3R2jWjNj3/">https://fb.watch/nN3R2jWjNj3/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/211514391571867/">https://www.facebook.com/realammonbundy/video/s/211514391571867/</a>	2/16/2024	J, O, U
D52	8/13/2023	I made it home on a \$10,000 bond. Thanks for all the prayers. I wonder if they will ever leave my family alone? This could happen to you...	<a href="https://fb.watch/nJd2aoQ8E/">https://fb.watch/nJd2aoQ8E/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/211514391571867/">https://www.facebook.com/realammonbundy/video/s/211514391571867/</a>	2/16/2024	J, O, U
D53	8/14/2023	Evidence that CPS Agents, Meridian Police & St. Luke's Staff LIED about why they took Baby Cyrus	<a href="https://fb.watch/nN3Q9tiZnL/">https://fb.watch/nN3Q9tiZnL/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/249311444648274/">https://www.facebook.com/realammonbundy/video/s/249311444648274/</a>	2/16/2024	J, O, N
D54	8/14/2023	Evidence that CPS Agents, Meridian Police & St. Luke's Staff LIED about why they took Baby Cyrus	<a href="https://fb.watch/nJdJcYUJZ/">https://fb.watch/nJdJcYUJZ/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/249311444648274/">https://www.facebook.com/realammonbundy/video/s/249311444648274/</a>	2/16/2024	J, O, N
D55	8/16/2023	I don't think Idaho is a place for lying doctors, lawyers, executives and reporters. I hope they'll go somewhere else to do their lying!	<a href="https://fb.watch/nN3N3UdiCaw/">https://fb.watch/nN3N3UdiCaw/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/841977390971278/">https://www.facebook.com/realammonbundy/video/s/841977390971278/</a>	2/16/2024	U
D56	8/16/2023	I don't think Idaho is a place for lying doctors, lawyers, executives and reporters. I hope they'll go somewhere else to do their lying!	<a href="https://fb.watch/nJdHeyPCIG/">https://fb.watch/nJdHeyPCIG/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/841977390971278/">https://www.facebook.com/realammonbundy/video/s/841977390971278/</a>	2/16/2024	U
D57	8/28/2023	Please Read: Recent Letter to Erik Stidham, Lead St. Lukes Attorney, linking to Twitter and PRN letter	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/16/2024	U
D58	8/30/2023	I'm not going anywhere...	<a href="https://fb.watch/nN3Lamnea9/">https://fb.watch/nN3Lamnea9/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/1298346761049257/">https://www.facebook.com/realammonbundy/video/s/1298346761049257/</a>	2/16/2024	J, U,
D59	8/30/2023	I'm not going anywhere...	<a href="https://fb.watch/nJdGa4iQIL/">https://fb.watch/nJdGa4iQIL/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/1298346761049257/">https://www.facebook.com/realammonbundy/video/s/1298346761049257/</a>	2/16/2024	J, U
D60	9/13/2023	This is one of the saddest things I've seen in a long time...	<a href="https://fb.watch/nN3KbclZ8C/">https://fb.watch/nN3KbclZ8C/</a>	10/16/2023			J, O, N
D61	9/13/2023	This is one of the saddest things I've seen in a long time...	<a href="https://fb.watch/nJdF1taJRS/">https://fb.watch/nJdF1taJRS/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/990251258972261/">https://www.facebook.com/realammonbundy/video/s/990251258972261/</a>	2/16/2024	J, O, N
D62	9/13/2023	Will They Kill to Silence? Is this Really about Defamation?  Damning evidence that Idaho CPS, Meridian Police and St. Luke's Hospital wrongfully took a baby and will stop at nothing to silence.	<a href="https://fb.watch/nN3HcVfTU/">https://fb.watch/nN3HcVfTU/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/846571486746773/">https://www.facebook.com/realammonbundy/video/s/846571486746773/</a>	2/16/2024	D, I, J, N, O, V
D63	9/13/2023	Will They Kill to Silence? Is this Really about Defamation?	<a href="https://fb.watch/nJdE2_PIEJ/">https://fb.watch/nJdE2_PIEJ/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/846571486746773/">https://www.facebook.com/realammonbundy/video/s/846571486746773/</a>	2/16/2024	D, I, J, N, O, V
D64	9/29/2023	Oh boy, do I have some information for you! The truth will prevail, just as it always has.	<a href="https://www.facebook.com/realammonbundy/video/s/165100789982091/">https://www.facebook.com/realammonbundy/video/s/165100789982091/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/165100789982091/">https://www.facebook.com/realammonbundy/video/s/165100789982091/</a>	2/16/2024	U
D65	9/29/2023	Oh boy, do I have some information for you! The truth will prevail, just as it always has.	<a href="https://fb.watch/nJdCTmlyV1/">https://fb.watch/nJdCTmlyV1/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/165100789982091/">https://www.facebook.com/realammonbundy/video/s/165100789982091/</a>	2/16/2024	U
D66	10/8/2023	Judges, Lawyers & Bureaucrats are destroying this country!	<a href="https://fb.watch/nN3DITfJKW/">https://fb.watch/nN3DITfJKW/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/250434284227044/">https://www.facebook.com/realammonbundy/video/s/250434284227044/</a>	2/16/2024	J
D67	10/8/2023	Judges, Lawyers & Bureaucrats are destroying this country!	<a href="https://fb.watch/nJdBgGYUG/">https://fb.watch/nJdBgGYUG/</a>	10/16/2023	<a href="https://www.facebook.com/realammonbundy/video/s/250434284227044/">https://www.facebook.com/realammonbundy/video/s/250434284227044/</a>	2/16/2024	J
D68	10/23/2023	They think that they can come into our homes! The email: ☹☹☹ Mr. Bundy, In light of your e-mail of last night refusing to agree to a date and time, I'm serving on you a notice that unilaterally schedules the visit by the appraiser and me to your house on Thursday, October 26, at 10:00 a.m. Under the rules that govern these sorts of things, we're entitled to inspect the house because it's relevant to the lawsuit even though I know that wouldn't be your preference. My appraiser has told me the inspection will not last more than one hour. Please confirm you will permit the inspection at that time. I scheduled it at a time when I assume your children will be at school.  I look forward to your anticipated cooperation then. Please let me know if you have any questions or concerns. Bob Faucher Holland & Hart RFaucher@hollandhart.com			<a href="https://fb.watch/gkAwnQDk9q/">https://fb.watch/gkAwnQDk9q/</a>	2/20/2024	J, K







Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
D69	10/23/2023	VIDEO			VIDEO	2/20/2024	J, K
D70	11/1/2023	Update - Forced Entry, Contempt Charges, Football Boys, Car Projects...			<a href="https://fb.watch/qkAU9zh0-5/">https://fb.watch/qkAU9zh0-5/</a>	2/20/2024	H, J, K, N, V
D71	11/1/2023	VIDEO			VIDEO		
D72	11/1/2023	Police LIED to take this baby from hi mother!  Visit <a href="https://freedomman.org/cyrus">freedomman.org/cyrus</a> for the full story			<a href="https://fb.watch/qkCcucbitHH/">https://fb.watch/qkCcucbitHH/</a>	2/20/2024	D, H, I, J, N, O, V
D73	11/1/2023	Police LIED to take this baby from hi mother!  Visit <a href="https://freedomman.org/cyrus">freedomman.org/cyrus</a> for the full story			VIDEO		
D74	11/2/2023	The state taking children from parents is a serious matter. Should the courts be used to destitute a family for speaking against it? Here is what is happening to the Bundy family and why it is dangerous territory for all of us. The Cost of Standing for a Baby   <a href="https://twitter.com/realabundy/status/1720131414790693013...">https://twitter.com/realabundy/status/1720131414790693013...</a>			<a href="https://www.facebook.com/photo/?fbid=649328354050997&amp;set=a.161344339516070">https://www.facebook.com/photo/?fbid=649328354050997&amp;set=a.161344339516070</a>	2/20/2024	
D75	11/8/2023	CPS took Cyrus from his loving parents and tried to give him to foster parents. Thousands of people fought to get him back and he was returned in 6 days!! Baby Cyrus is now happy and healthy in his parents' loving care! Learn more here  <a href="https://freedomman.org/cyrus">freedomman.org/cyrus</a>			<a href="https://www.facebook.com/realammonbundy/videos/308552085431354">https://www.facebook.com/realammonbundy/videos/308552085431354</a>	2/20/2024	
D76	11/8/2023	CPS took Cyrus from his loving parents and tried to give him to foster parents. Thousands of people fought to get him back and he was returned in 6 days!! Baby Cyrus is now happy and healthy in his parents' loving care! Learn more here  <a href="https://freedomman.org/cyrus">freedomman.org/cyrus</a>			VIDEO		
D77	11/13/2023	Today Judge Baskin issued a \$250,000 warrant for my arrest. The only thing I care to say is that I don't regret any of it. I was honest in everything I said and getting Baby Cyrus back makes all of the trouble worth it. Please pray for my family.			<a href="https://www.facebook.com/photo/?fbid=654867763497056&amp;set=pcb.654868070163692">https://www.facebook.com/photo/?fbid=654867763497056&amp;set=pcb.654868070163692</a>	2/20/2024	
D78	11/21/2023	St. Luke's attorneys would love nothing more than for me to counter sue them. They would make thousands of dollars an hour for many more years. A complete win for them no matter how it goes. The other winner would be the attorneys we hire. We would need to raise hundred of thousands of dollars to pay them. When people lose interest and stoped donating I would be left to pay the legal expenses. Finally, I don't believe there is a court in Idaho that would rule for the people and against the establishment.  I did not ask for people to donate to counter sue St. Luke's. That link was posted by someone who had access to my social media accounts. I just found out about it today.  If you wish to be refunded then I will ask the person who collected the funds to return it. Sorry for the confusion!			<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/20/2024	
D79	12/2/2023	My response to the Atlantic Report: This case has been very intense on both sides. Many people on each side have said terrible things. It is dishonest for a reporter to take the anonymous words in a single voice mail or email and try to make it look like the mainstream. Jacob knows better than to do this. However, I'm not surprised as he is the son of two D.C. lawyers and works for a liberal rag.			<a href="https://www.facebook.com/photo/?fbid=664223985894767&amp;set=a.161344339516070">https://www.facebook.com/photo/?fbid=664223985894767&amp;set=a.161344339516070</a>	2/20/2024	
D80	12/2/2023	St. Luke's Health System and CEO Chris Roth have officially taken ownership of my home and farm in Emmett. My family and I had many amazing memories there and it is very sad to us. When I purchased the home nearly a decade ago we dreamed of living in Emmett the rest of our lives. I pray that the Lord will bless my family with peace. I don't want to withhold anything from the Lord and I don't regret standing for baby Cyrus, but the cost has been terrible. I somehow believed that if I kept beating the drum of truth something would break loose and this attack on my family and I would not prevail. Losing our home hurts. Speaking out against the rich and powerful in the United States is expensive and dangerous.			<a href="https://www.facebook.com/photo/?fbid=664681822515650&amp;set=a.161344339516070">https://www.facebook.com/photo/?fbid=664681822515650&amp;set=a.161344339516070</a>	2/20/2024	


Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
D81	12/4/2023	St. Luke's Health System took my home. Who are they and what does this mean for Idahoans? #idpol #idleg #savebabycyrus #takecareofmaya			<a href="https://www.facebook.com/realammonbundy/videos/1026670188408448">https://www.facebook.com/realammonbundy/videos/1026670188408448</a>	2/20/2024	
D82	12/4/2023	St. Luke's Health System took my home. Who are they and what does this mean for Idahoans? #idpol #idleg #savebabycyrus #takecareofmaya			VIDEO		
D83	12/21/2023	Until we defend each other, and I'm not talking in some de-facto court, we will be reduced to nothing. Fighting any other way is a waste of time and resources. People want to be popular and ask for other people's money. They claim to have the solution and that they are fighting the right way but it has all gone astray. As a people we must build a physical defense against the wicked or they will keep taking until everyone has nothing left. Just simply history.  <a href="https://www.youtube.com/live/UTYyeN7Qlhw?si=IsaOOVnpeVegIL_">https://www.youtube.com/live/UTYyeN7Qlhw?si=IsaOOVnpeVegIL_</a>			<a href="https://www.facebook.com/realammonbundy/videos/1023399335622011">https://www.facebook.com/realammonbundy/videos/1023399335622011</a>	2/20/2024	
D84	12/21/2023	Until we defend each other, and I'm not talking in some de-facto court, we will be reduced to nothing. Fighting any other way is a waste of time and resources.			VIDEO		
D85	12/22/2023	The loss of freedom is synonymous with the consolidation of power. For Idahoans, healthcare services are becoming a massive colossus under the control of a single entity. This same power is controlling much of Idaho's government agencies and funding. St. Lukes Executives and Board of Directors are controlling much more than hospitals. For more info click here			<a href="https://www.facebook.com/realammonbundy">https://www.facebook.com/realammonbundy</a>	2/20/2024	
D86	12/28/2023	Update on the money St. Luke's CEO stole right before Christmas			<a href="https://www.facebook.com/realammonbundy/videos/330420596502471">https://www.facebook.com/realammonbundy/videos/330420596502471</a>	2/20/2024	
D87	12/28/2023	Update on the money St. Luke's CEO stole right before Christmas			VIDEO		
D88	1/6/2024	The Idaho good old boys make millions off of sex change surgeries on children. They are pushing a transgender/homosexual agenda in Idaho. I have exposed these people many times and they hate me for it. So, they use the liberal courts to financially destroy and try to silence me. Here is a good example of what I do to make them so motivated to silence me. <a href="https://youtu.be/c3pyzErrj08?si=xxGTe9IooEjhWnZZ">https://youtu.be/c3pyzErrj08?si=xxGTe9IooEjhWnZZ</a>			<a href="https://www.facebook.com/realammonbundy/videos/321334327558044">https://www.facebook.com/realammonbundy/videos/321334327558044</a>	2/20/2024	
D89	1/6/2024	The Idaho good old boys make millions off of sex change surgeries on children			VIDEO		
D90	1/8/2024	Idaho Judge, Nancy Baskin, issued a \$250,000 warrant for Ammon Bundy's arrest for publishing this video and others like it. The Idaho good old boys will do just about anything to silence those who oppose their authoritarian agenda. They believe they have the power to take anything they wish away, including babies from parents. Youtube was ordered by St. Luke's attorney to take this video down. After making minor edits to satisfy YouTube we republished it. <a href="https://youtu.be/i2CNnyZGT8?si=5TqFDyFbm0laawN-LongLiveTheTruth!">https://youtu.be/i2CNnyZGT8?si=5TqFDyFbm0laawN-LongLiveTheTruth!</a>			<a href="https://www.facebook.com/realammonbundy/videos/927818778695541">https://www.facebook.com/realammonbundy/videos/927818778695541</a>	2/20/2024	
D91	1/8/2024	Idaho Judge, Nancy Baskin, issued a \$250,000 warrant for Ammon Bundy's arrest for publishing this video and others like it.			VIDEO		
D92	1/9/2024	They took a baby, got paid and lied about it! CPS Agents, Meriden Police, St. Lukes Medical Staff FLAT-OUT lied about why they took Baby Cyrus. Here is the evidence. Then they got their attorneys to try and cover it all up using the courts.			<a href="https://www.facebook.com/realammonbundy/videos/359073530086723">https://www.facebook.com/realammonbundy/videos/359073530086723</a>	2/20/2024	
D93	1/9/2024	They took a baby, got paid and lied about it! CPS Agents, Meriden Police, St. Lukes Medical Staff FLAT-OUT lied about why they took Baby Cyrus. Here is the evidence. Then they got their attorneys to try and cover it all up using the courts.			VIDEO		
D94	2/22/2024	They took a baby from loving parents because they missed one doctor's appointment!			<a href="https://www.facebook.com/realammonbundy/videos/1576073056491525/">https://www.facebook.com/realammonbundy/videos/1576073056491525/</a>	2/28/2024	

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
D95	2/22/2024	They took a baby from loving parents because they missed one doctor's appointment!			VIDEO		
D96	2/26/2024	Want to know where Ammon Bundy is?			<a href="https://www.facebook.com/realammonbundy/videos/1174890043473864/">https://www.facebook.com/realammonbundy/videos/1174890043473864/</a>	2/28/2024	
D97	2/26/2024	Want to know where Ammon Bundy is?			VIDEO		
D98	2/29/2024	This is what POLITICAL CORRUPTION looks like! Everyone knows that the BLM (Bureau of Land Management) and the FBI hate the Bundys. So why was Judge Lynn Norton assigned to preside over the St. Luke's lawsuit? Also why was the FBI behind the scenes manipulating St. Luke's after Baby Cyrus was taken?			<a href="https://www.facebook.com/realammonbundy/videos/363015776606531">https://www.facebook.com/realammonbundy/videos/363015776606531</a>	3/8/2024	
D99	2/29/2024	This is what POLITICAL CORRUPTION looks like! Everyone knows that the BLM (Bureau of Land Management) and the FBI hate the Bundys. So why was Judge Lynn Norton assigned to preside over the St. Luke's lawsuit? Also why was the FBI behind the scenes manipulating St. Luke's after Baby Cyrus was taken?			VIDEO		
D100	3/4/2024	I will give you \$10,000 cash on one condition.			<a href="https://www.facebook.com/realammonbundy/videos/772393078142923">https://www.facebook.com/realammonbundy/videos/772393078142923</a>	3/8/2024	
D101	3/4/2024	I will give you \$10,000 cash on one condition.			VIDEO		
D102	3/14/2024	I have been asked this several times. "Why did you not mobilize PRN to defend your house that St Luke's seized? Like you defended the Bundy Ranch before."			<a href="https://www.facebook.com/photo/?fbid=721877080129457&amp;set=a.161344339516070">https://www.facebook.com/photo/?fbid=721877080129457&amp;set=a.161344339516070</a>	3/28/2024	



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E1	3/12/2022	For Immediate Release: IN the early morning of March 12, 2022, while standing for parental rights and against medical tyranny, Ammon Bundy was arrested in front of St. Luke's Hospital in Meridian for the crime of disagreeing with the hospital and CPS. ....	<a href="https://twitter.com/RealABundy/status/1502610950666420228/photo/1">https://twitter.com/RealABundy/status/1502610950666420228/photo/1</a>		<a href="https://twitter.com/RealABundy/status/1502610950666420228">https://twitter.com/RealABundy/status/1502610950666420228</a>	2/16/2024	A, J
E2	3/12/2022	Please read. Last night my very good friend Diego's grandson was medically kidnapped because a medical practitioner called CPS for a missed doctor appointment. If this happened to them, it could happen to you. We must stand against this medical tyranny. <a href="https://freedomman.org/cyrus/">https://freedomman.org/cyrus/</a>	<a href="https://twitter.com/RealABundy/status/1502674374721114112">https://twitter.com/RealABundy/status/1502674374721114112</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1502674374721114112">https://twitter.com/RealABundy/status/1502674374721114112</a>	2/16/2024	A, J
E3	3/14/2022	Thank you @OANN for having me on to bring light to this terrible injustice in Idaho. We must get baby Cyrus home to his loving family! He and his family are worth fighting for! #SaveBabyCyrus <a href="https://oann.com/ammon-bundy-fights-medical-tyranny-in-idaho/">https://oann.com/ammon-bundy-fights-medical-tyranny-in-idaho/</a>	<a href="https://twitter.com/RealABundy/status/1503537607547908098">https://twitter.com/RealABundy/status/1503537607547908098</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1503537607547908098">https://twitter.com/RealABundy/status/1503537607547908098</a>	2/16/2024	A, B, J
E4	3/15/2022	EMERGENCY MESSAGE. Please gather at the hospital now. St Luke's Boise. #savebabycyrus	<a href="https://twitter.com/RealABundy/status/1503806477252775940">https://twitter.com/RealABundy/status/1503806477252775940</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1503806477252775940">https://twitter.com/RealABundy/status/1503806477252775940</a>	2/16/2024	A, B, J
E5	3/16/2022	Multi generational freedom fighters standing up for our rights. It's so powerful. #savebabycyrus  Reminder, today Baby Cyrus's hearing continues. Please support at the Ada County Courthouse at noon. People will also be at St Luke's Boise between 10am and 8pm.	<a href="https://twitter.com/RealABundy/status/1504132279219630091">https://twitter.com/RealABundy/status/1504132279219630091</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1504132279219630091">https://twitter.com/RealABundy/status/1504132279219630091</a>	2/16/2024	A, B, J
E6	3/16/2022	Thankful for all of the Idahoans who are showing up to stand in support of the Anderson and Chavoya families. #savebabycyrus	<a href="https://twitter.com/RealABundy/status/1504173070612791298">https://twitter.com/RealABundy/status/1504173070612791298</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1504173070612791298">https://twitter.com/RealABundy/status/1504173070612791298</a>	2/16/2024	A, B, J
E7	3/17/2022	The state wants to destroy your family. #idpol #savebabycyrus <a href="https://youtu.be/gfMbo9BR2CE">https://youtu.be/gfMbo9BR2CE</a>	<a href="https://twitter.com/RealABundy/status/1504345070585069575">https://twitter.com/RealABundy/status/1504345070585069575</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1504345070585069575">https://twitter.com/RealABundy/status/1504345070585069575</a>	2/16/2024	A, B, J, V
E8	3/17/2022	The state wants to destroy your family. #idpol #savebabycyrus Sharing Your Children do not belong to you! video <a href="https://youtu.be/gfMbo9BR2CE">https://youtu.be/gfMbo9BR2CE</a>	<a href="https://www.youtube.com/watch?v=gfMbo9BR2CE">https://www.youtube.com/watch?v=gfMbo9BR2CE</a>				A, B, J, V
E9	3/18/2022	Baby Cyrus is home! #savebabycyrus	<a href="https://twitter.com/RealABundy/status/1504987905105674240">https://twitter.com/RealABundy/status/1504987905105674240</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1504987905105674240">https://twitter.com/RealABundy/status/1504987905105674240</a>	2/16/2024	A, B, J
E10	3/18/2022	Baby Cyrus is home! #savebabycyrus	<a href="https://youtu.be/wS2b9UR8DOM">https://youtu.be/wS2b9UR8DOM</a>				U
E11	9/7/2022	Live now — St. Luke's is suing me, why I am not participating in the court process. <a href="https://facebook.com/realammonbundy/videos/423278493120502/">https://facebook.com/realammonbundy/videos/423278493120502/</a>	<a href="https://twitter.com/RealABundy/status/1567636263624212480">https://twitter.com/RealABundy/status/1567636263624212480</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1567636263624212480">https://twitter.com/RealABundy/status/1567636263624212480</a>	2/16/2024	H, I, J, R, O, U,
E12	4/27/2023	Chris Roth (CEO of St. Luke's), my offer still stands. My offer to give you everything I own has not changed. However, I do want to make it clear that it's in exchange for you giving me peace. I will not give you everything I own and my freedom.	<a href="https://twitter.com/RealABundy/status/1651662787746078733">https://twitter.com/RealABundy/status/1651662787746078733</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1651662787746078733">https://twitter.com/RealABundy/status/1651662787746078733</a>	2/16/2024	J, O
E13	4/27/2023	Chris Roth (CEO of St. Luke's), my offer still stands. My offer to give you everything I own has not changed. However, I do want to make it clear that it's in exchange for you giving me peace. I will not give you everything I own and my freedom.	<a href="https://youtu.be/NOsTYmrYC_g">https://youtu.be/NOsTYmrYC_g</a>	10/17/2023			J, O
E14	4/28/2023	The Pete Santilli Show with special guest Ammon Bundy: St. Luke's Hospital Is Trying To Destroy The People's Rights Network by Destroying Ammon Bundy. Thanks for having me on, Pete!	<a href="https://twitter.com/RealABundy/status/1652055235047706629">https://twitter.com/RealABundy/status/1652055235047706629</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1652055235047706629">https://twitter.com/RealABundy/status/1652055235047706629</a>	2/16/2024	J, H, O, P, T
E15	4/30/2023	Had a great time on the Nate Shelman Show last week speaking with Jim Smith about the ongoing harassment I have endured by St. Luke's and attorney Erik Stidham. Please listen to learn of the truth the mainstream media will never tell you.	<a href="https://twitter.com/RealABundy/status/1652707762025930753">https://twitter.com/RealABundy/status/1652707762025930753</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1652707762025930753">https://twitter.com/RealABundy/status/1652707762025930753</a>	2/16/2024	J, U, I, N, O, T,
E16	5/3/2023	I joined Sam Bushman on Liberty Roundtable to discuss the facts about the Baby Cyrus story and the St. Luke's lawsuit. Listen to the full discussion here <a href="https://www.libertyroundtable.com/.../radio-show-hour-2.../">https://www.libertyroundtable.com/.../radio-show-hour-2.../</a>	<a href="https://twitter.com/RealABundy/status/1653947896667025410">https://twitter.com/RealABundy/status/1653947896667025410</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1653947896667025410">https://twitter.com/RealABundy/status/1653947896667025410</a>	2/16/2024	A, B, C, H, M, O, P, S, U

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E17	5/6/2023	Here is proof that St.Luke's KNEW that Baby Cyrus was NOT in imminent danger the night he was taken. Yet they kept him from his mother (his only source of nutrition) anyways.  The State of Idaho has admitted they were wrong, returned Cyrus and dropped all charges against the family.  Why won't St.Luke's admit they were wrong and drop the lawsuit? <a href="https://youtu.be/XKVMvmkRoe4">https://youtu.be/XKVMvmkRoe4</a> #savebabycyrus #idpol #savethechildren	<a href="https://twitter.com/RealABundy/status/1654923632286613509">https://twitter.com/RealABundy/status/1654923632286613509</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1654923632286613509">https://twitter.com/RealABundy/status/1654923632286613509</a>	2/16/2024	A, B, J, H, M
E18	5/8/2023	If you want to hear all of the accurate details from the Baby Cyrus case, including some that have never been shared before, be sure to join this virtual live town hall event this Wednesday, May 10th. Government Subsidized Child Trafficking	<a href="https://twitter.com/RealABundy/status/1655676513755209734">https://twitter.com/RealABundy/status/1655676513755209734</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1655676513755209734">https://twitter.com/RealABundy/status/1655676513755209734</a>	2/16/2024	A
E19	5/9/2023	Great discussion with Stew Peters about the Baby Cyrus case and the St. Luke's lawsuit. Thanks @realstewpeters Watch the full video here <a href="https://rumble.com/v2mxiyy-idaho-judge-targets-ammon-bundy-corrupt-hospital-sues-bundy-after-he-saved-.html">https://rumble.com/v2mxiyy-idaho-judge-targets-ammon-bundy-corrupt-hospital-sues-bundy-after-he-saved-.html</a> #idpol	<a href="https://twitter.com/RealABundy/status/1656160576094212096">https://twitter.com/RealABundy/status/1656160576094212096</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1656160576094212096">https://twitter.com/RealABundy/status/1656160576094212096</a>	2/16/2024	J, U
E20	5/10/2023	You won't want to miss this! Happening TODAY — May 10th! If you want to hear all of the accurate details from the Baby Cyrus case, including some that have never been shared before, be sure to join this virtual live town hall event this Wednesday, May 10th. Government Subsidized Child Trafficking	<a href="https://twitter.com/RealABundy/status/1656351779125354498">https://twitter.com/RealABundy/status/1656351779125354498</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1656351779125354498">https://twitter.com/RealABundy/status/1656351779125354498</a>	2/16/2024	A
E21	5/11/2023	In case you missed it, the Baby Cyrus presentation is now live:  <a href="https://freedomman.org/video/government-subsidized-child-trafficking/">https://freedomman.org/video/government-subsidized-child-trafficking/</a>	<a href="https://twitter.com/RealABundy/status/1656670568056500224">https://twitter.com/RealABundy/status/1656670568056500224</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1656670568056500224">https://twitter.com/RealABundy/status/1656670568056500224</a>	2/16/2024	A, B, C, E, M, R, Q, T, V, S, J, U, H
E22	5/12/2023	Bryan Hyde shares insight about the St. Luke's lawsuit and the Baby Cyrus story. Thanks Bryan!	<a href="https://twitter.com/RealABundy/status/1657189329297367041">https://twitter.com/RealABundy/status/1657189329297367041</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1657189329297367041">https://twitter.com/RealABundy/status/1657189329297367041</a>	2/16/2024	A, H,
E23	5/15/2023	Letter to Erik Stidham (St. Lukes Lead Attorney) from Ammon Bundy —  If I do not have the right to publish and speak about what the evidence shows happened to baby Cyrus, then what right do I have to speak at all?  <a href="https://peoplesrights.org/news/?letter-to-erik-stidham-st-lukes-lead-attorney-from-ammon-bundy/3f51d298-daf4-4d77-b25e-9d78394dc5a1#firstamendment">https://peoplesrights.org/news/?letter-to-erik-stidham-st-lukes-lead-attorney-from-ammon-bundy/3f51d298-daf4-4d77-b25e-9d78394dc5a1#firstamendment</a> #idpol #idleg #savebabycyrus #saveourchildren	<a href="https://twitter.com/RealABundy/status/1658179708767330319">https://twitter.com/RealABundy/status/1658179708767330319</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1658179708767330319">https://twitter.com/RealABundy/status/1658179708767330319</a>	2/16/2024	P
E24	5/19/2023	It's like David & Goliath, quick but detailed update video on the Ammon Bundy/St. Luke's case by Bryan Hyde.	<a href="https://twitter.com/RealABundy/status/1659650652471959561">https://twitter.com/RealABundy/status/1659650652471959561</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1659650652471959561">https://twitter.com/RealABundy/status/1659650652471959561</a>	2/16/2024	P
E25	5/23/2023	One visit to the doctor and the Anderson's happy life of joy and love turned into their worst nightmare. ...This could happen to anybody, don't be alone when it does. Join PeoplesRights.org	<a href="https://twitter.com/RealABundy/status/1661028326390071296">https://twitter.com/RealABundy/status/1661028326390071296</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1661028326390071296">https://twitter.com/RealABundy/status/1661028326390071296</a>	2/16/2024	O, U
E26	5/23/2023	One visit to the doctor and the Anderson's happy life of joy and love turned into their worst nightmare. ...This could happen to anybody, don't be alone when it does. Join PeoplesRights.org	<a href="https://twitter.com/i/status/1661028326390071296">https://twitter.com/i/status/1661028326390071296</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1661028326390071296">https://twitter.com/RealABundy/status/1661028326390071296</a>	2/16/2024	O, U
E27	5/26/2023	WATCH: The TRUTH about Ammon Bundy, the case of Baby Cyrus, and the CORRUPT system attempting to CRUSH anyone who stands up against them!	<a href="https://twitter.com/RealABundy/status/1662205645427458049">https://twitter.com/RealABundy/status/1662205645427458049</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1662205645427458049">https://twitter.com/RealABundy/status/1662205645427458049</a>	2/16/2024	O, U, P
E28	5/26/2023	WATCH: The TRUTH about Ammon Bundy, the case of Baby Cyrus, and the CORRUPT system attempting to CRUSH anyone who stands up against them!	<a href="https://twitter.com/i/status/1662205645427458049">https://twitter.com/i/status/1662205645427458049</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1662205645427458049">https://twitter.com/RealABundy/status/1662205645427458049</a>	2/16/2024	O, U, P
E29	5/28/2023	This time last year, Diego and I celebrated CPS' reluctant return of Diego's grandson Cyrus. However since then we have bee hunted like the early day reformers and are now both fugitives of the law. ....	<a href="https://twitter.com/RealABundy/status/1662833555372662784">https://twitter.com/RealABundy/status/1662833555372662784</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1662833555372662784">https://twitter.com/RealABundy/status/1662833555372662784</a>	2/16/2024	J

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
E30	5/29/2023	St. Luke was a doctor; a healer. Hospitals all around the world use his name for their medical facilities. Baby Cyrus, his mother, and his father went there for help and it ended up being a nightmare. This isn't what St. Luke would have wanted. Hospitals were meant to help, not hurt.	<a href="https://twitter.com/RealABundy/status/1663389701599023111">https://twitter.com/RealABundy/status/1663389701599023111</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1663389701599023111">https://twitter.com/RealABundy/status/1663389701599023111</a>	2/16/2024	O
E31	5/29/2023	St. Luke was a doctor; a healer. Hospitals all around the world use his name for their medical facilities. Baby Cyrus, his mother, and his father went there for help and it ended up being a nightmare. This isn't what St. Luke would have wanted. Hospitals were meant to help, not hurt.	<a href="https://twitter.com/i/status/1663389701599023111">https://twitter.com/i/status/1663389701599023111</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1663389701599023111">https://twitter.com/RealABundy/status/1663389701599023111</a>	2/16/2024	O
E32	5/24/2023	Due to the Andersons being part of the Peoples Rights Network, neighbors united in defense of the family, and baby Cyrus was returned to his parents in 6 days. ... This could happen to anybody, don't be alone when it does. Join PeoplesRights.org	<a href="https://twitter.com/RealABundy/status/1661441723535446016">https://twitter.com/RealABundy/status/1661441723535446016</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1661441723535446016">https://twitter.com/RealABundy/status/1661441723535446016</a>	2/16/2024	O, U, P
E33	5/24/2023	Due to the Andersons being part of the Peoples Rights Network, neighbors united in defense of the family, and baby Cyrus was returned to his parents in 6 days. ... This could happen to anybody, don't be alone when it does. Join PeoplesRights.org	<a href="https://twitter.com/i/status/1661441723535446016">https://twitter.com/i/status/1661441723535446016</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1661441723535446016">https://twitter.com/RealABundy/status/1661441723535446016</a>	2/16/2024	O, U, P
E34	6/13/2013	Update from June 7, 2023  St. Lukes and Holland & Hart are trying to make an example out of Diego and I by suing us for 7.5 million dollars for speaking out when Baby Cyrus was taken.  It appears that Holland & Hart is trying to stifle the people's voices and crush their ability to speak out against institutions or the government when they do wrong.	<a href="https://twitter.com/RealABundy/status/1668853775161753606">https://twitter.com/RealABundy/status/1668853775161753606</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1668853775161753606">https://twitter.com/RealABundy/status/1668853775161753606</a>	2/16/2024	I, K, O
E35	6/13/2013	Update from June 7, 2023  St. Lukes and Holland & Hart are trying to make an example out of Diego and I by suing us for 7.5 million dollars for speaking out when Baby Cyrus was taken.  It appears that Holland & Hart is trying to stifle the people's voices and crush their ability to speak out against institutions or the government when they do wrong.	<a href="https://twitter.com/i/status/1668853775161753606">https://twitter.com/i/status/1668853775161753606</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1668853775161753606">https://twitter.com/RealABundy/status/1668853775161753606</a>	2/16/2024	I, K, O
E36	6/18/2023	St. Luke's, one of the largest institutions in Idaho, has civilly sued me because they didn't like what I said when Baby Cyrus was taken. What started out as a \$50,000 judgement has now increased to an egregious amount of \$7.5 million. Interview with Bryan Hyde	<a href="https://twitter.com/i/status/1670314210201333760">https://twitter.com/i/status/1670314210201333760</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1670314210201333760">https://twitter.com/RealABundy/status/1670314210201333760</a>	2/16/2024	O
E37	6/25/2023	St. Luke's CEO Chris Roth just billed Diego and I \$18,103.20 because we appealed to the federal courts.	<a href="https://twitter.com/RealABundy/status/1672982626645286916">https://twitter.com/RealABundy/status/1672982626645286916</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1670314210201333760">https://twitter.com/RealABundy/status/1670314210201333760</a>	2/16/2024	A, C, J,
E38	6/25/2023	St. Luke's CEO Chris Roth just billed Diego and I \$18,103.20 because we appealed to the federal courts.	<a href="https://twitter.com/i/status/1672982626645286916">https://twitter.com/i/status/1672982626645286916</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1672982626645286916">https://twitter.com/RealABundy/status/1672982626645286916</a>	2/16/2024	A, C, J,
E39	7/10/2023	Letter to Judge Baskin from Ammon Bundy, sharing People's Rights Network letter	<a href="https://twitter.com/RealABundy/status/1678548443491610625">https://twitter.com/RealABundy/status/1678548443491610625</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1678548443491610625">https://twitter.com/RealABundy/status/1678548443491610625</a>	2/16/2024	U, T
E40	7/18/2023	If they didn't steal Baby Cyrus, none of this would have happened.  I only spoke the absolute truth when it came to Baby Cyrus and St.Luke's is now trying to get the courts to justify them taking everything we own.	<a href="https://twitter.com/RealABundy/status/1681401123528392705">https://twitter.com/RealABundy/status/1681401123528392705</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1681401123528392705">https://twitter.com/RealABundy/status/1681401123528392705</a>	2/16/2024	J, O
E41	7/18/2023	If they didn't steal Baby Cyrus, none of this would have happened.	<a href="https://twitter.com/i/status/1681401123528392705">https://twitter.com/i/status/1681401123528392705</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1681401123528392705">https://twitter.com/RealABundy/status/1681401123528392705</a>	2/16/2024	J, O

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
E42	7/24/2023	Massive institutions combined with the state, financially benefitting when they take a child is one of the worst combinations a parent can imagine. Therefore, to counter, the cost of stealing a baby must be extremely high and good people must assure strong consequences when it happens. Idaho CPS agents, Meridian police & St. Luke's staff so far have gotten off easy. They may have the means to use the courts to cover for their actions, but taking a baby from loving parents no matter how they abuse the courts is wrong and should never happen! People in a jury deciding how much St. Luke's is going to take from those who exposed the truth about them is a mockery to justice. When a baby is born he or she does not become property of the state or hospital executives. CPS agents, Meridian Police Officers and St. Luke's staff would do well to remember that. <a href="https://youtu.be/T04KV7Ds6EA">https://youtu.be/T04KV7Ds6EA</a>	<a href="https://twitter.com/RealABundy/status/1683700789028753408">https://twitter.com/RealABundy/status/1683700789028753408</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1683700789028753408">https://twitter.com/RealABundy/status/1683700789028753408</a>	2/16/2024	J, O, N
E43	7/29/2023	St. Luke's Children's Hospital webpage is still advertising minor hormone therapy and sex change surgeries. This video gives proof.  Here is a link to one of St. Luke's Hospital pages advertising transgender surgeries and hormone therapy for minors: <a href="https://stlukesonline.org/communi...">https://stlukesonline.org/communi...</a>  Idaho passed a law that made both minor hormone therapy and child sex change surgeries illegal. However, that Idaho law does not go into effect until 2024. I guess all the children until then are sacrificial lambs to St. Luke's Hospital Executives.	<a href="https://twitter.com/RealABundy/status/1685405333899128832">https://twitter.com/RealABundy/status/1685405333899128832</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1685405333899128832">https://twitter.com/RealABundy/status/1685405333899128832</a>	2/16/2024	J
E44	7/29/2023	St. Luke's Children's Hospital webpage is still advertising minor hormone therapy and sex change surgeries. This video gives proof.  Here is a link to one of St. Luke's Hospital pages advertising transgender surgeries and hormone therapy for minors: <a href="https://stlukesonline.org/communi...">https://stlukesonline.org/communi...</a>  Idaho passed a law that made both minor hormone therapy and child sex change surgeries illegal. However, that Idaho law does not go into effect until 2024. I guess all the children until then are sacrificial lambs to St. Luke's Hospital Executives.	<a href="https://twitter.com/i/status/1685405333899128832">https://twitter.com/i/status/1685405333899128832</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1685405333899128832">https://twitter.com/RealABundy/status/1685405333899128832</a>	2/16/2024	J
E45	8/9/2023	St. Luke's executives, lawyers & witnesses lied to the jury many times. Here are a few examples of them lying to the jury. No wonder the jury was so motivated to hang us with \$52 Million. Idaho is not a place for lying doctors, lawyers, executives and reporters...go somewhere else to do your lying!	<a href="https://twitter.com/RealABundy/status/1689468530599903232">https://twitter.com/RealABundy/status/1689468530599903232</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1689468530599903232">https://twitter.com/RealABundy/status/1689468530599903232</a>	2/16/2024	U
E46	8/9/2023	St. Luke's executives, lawyers & witnesses lied to the jury many times. Here are a few examples of them lying to the jury. No wonder the jury was so motivated to hang us with \$52 Million. Idaho is not a place for lying doctors, lawyers, executives and reporters...go somewhere else to do your lying!	<a href="https://twitter.com/i/status/1689468530599903232">https://twitter.com/i/status/1689468530599903232</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1689468530599903232">https://twitter.com/RealABundy/status/1689468530599903232</a>	2/16/2024	U
E47	8/12/2023	Facts About Ammon's Contempt of Court Charge that Not A Single News Organization Has Cared to Share With You <a href="https://freedomman.org/2023/facts-about-ammons-contempt-of-court-charge/">https://freedomman.org/2023/facts-about-ammons-contempt-of-court-charge/</a>	<a href="https://twitter.com/RealABundy/status/1690461964852740096">https://twitter.com/RealABundy/status/1690461964852740096</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1690461964852740096">https://twitter.com/RealABundy/status/1690461964852740096</a>	2/16/2024	B
E48	8/12/2023	Please watch: This is why Ammon Bundy was arrested. SAVING BABY CYRUS video. <a href="https://twitter.com/RealABundy/status/1690446450533269504">https://twitter.com/RealABundy/status/1690446450533269504</a>	<a href="https://twitter.com/RealABundy/status/1690446450533269504">https://twitter.com/RealABundy/status/1690446450533269504</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1690446450533269504">https://twitter.com/RealABundy/status/1690446450533269504</a>	2/16/2024	O, U, P
E49	8/12/2023	Please watch: This is why Ammon Bundy was arrested. SAVING BABY CYRUS video. <a href="https://twitter.com/i/status/1690446450533269504">https://twitter.com/i/status/1690446450533269504</a>	<a href="https://twitter.com/i/status/1690446450533269504">https://twitter.com/i/status/1690446450533269504</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1690446450533269504">https://twitter.com/RealABundy/status/1690446450533269504</a>	2/16/2024	O,U,P
E50	8/13/2023	I made it home on a \$10,000 bond. Thanks for all the prayers. I wonder if they will ever leave my family alone? This could happen to you. <a href="https://twitter.com/i/status/1690894901733654528">https://twitter.com/i/status/1690894901733654528</a>	<a href="https://twitter.com/i/status/1690894901733654528">https://twitter.com/i/status/1690894901733654528</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1690894901733654528">https://twitter.com/RealABundy/status/1690894901733654528</a>	2/16/2024	J, O, U
E51	8/14/2023	Evidence that CPS Agents, Meridian Police & St. Luke's Staff LIED about why they took Baby Cyrus <a href="https://twitter.com/RealABundy/status/1691231540402085888">https://twitter.com/RealABundy/status/1691231540402085888</a>	<a href="https://twitter.com/RealABundy/status/1691231540402085888">https://twitter.com/RealABundy/status/1691231540402085888</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1691231540402085888">https://twitter.com/RealABundy/status/1691231540402085888</a>	2/16/2024	J, O, N






Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
E52	8/14/2023	Evidence that CPS Agents, Meridian Police & St. Luke's Staff LIED about why they took Baby Cyrus	<a href="https://twitter.com/i/status/1691231540402085888">https://twitter.com/i/status/1691231540402085888</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1691231540402085888">https://twitter.com/RealABundy/status/1691231540402085888</a>	2/16/2024	J, O, N
E53	8/16/2023	These are just SOME of the lies told to the jury by St. Luke's executives, lawyers & witnesses.	<a href="https://twitter.com/RealABundy/status/1691939302760935567">https://twitter.com/RealABundy/status/1691939302760935567</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1691939302760935567">https://twitter.com/RealABundy/status/1691939302760935567</a>	2/16/2024	U
E54	8/28/2023	Please Read: Recent Letter to Erik Stidham, Lead St. Luke's Attorney	<a href="https://twitter.com/RealABundy">https://twitter.com/RealABundy</a>	10/17/2023	Main Twitter Page	2/16/2024	U
E55	8/30/2023	I'm not going anywhere...	<a href="https://twitter.com/RealABundy/status/1696940304627097887">https://twitter.com/RealABundy/status/1696940304627097887</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1696940304627097887">https://twitter.com/RealABundy/status/1696940304627097887</a>	2/16/2024	H, J, K, N, O, V
E56	8/30/2023	I'm not going anywhere...	<a href="https://youtu.be/ZV7ayCfZGz8">https://youtu.be/ZV7ayCfZGz8</a>	10/17/2023			H, J, K, N, O, V
E57	9/13/2023	This is one of the saddest things I've seen in a long time	<a href="https://twitter.com/RealABundy/status/1702121766066217056">https://twitter.com/RealABundy/status/1702121766066217056</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1702121766066217056">https://twitter.com/RealABundy/status/1702121766066217056</a>	2/16/2024	J, O, N
E58	9/13/2023	This is one of the saddest things I've seen in a long time	<a href="https://twitter.com/i/status/1702121766066217056">https://twitter.com/i/status/1702121766066217056</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1702121766066217056">https://twitter.com/RealABundy/status/1702121766066217056</a>	2/16/2024	J, O, N
E59	9/13/2023	Will They Kill to Silence? Is this Really about Defamation? Damning evidence that Idaho CPS, Meridian Police and St. Luke's Hospital wrongfully took a baby and will stop at nothing to silence. Check this video out for more evidence. They even lied to the jury!	<a href="https://twitter.com/RealABundy/status/1702187197741334757">https://twitter.com/RealABundy/status/1702187197741334757</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1702187197741334757">https://twitter.com/RealABundy/status/1702187197741334757</a>	2/16/2024	D, I, J, N, O, V
E60	9/13/2023	Will They Kill to Silence? Is this Really about Defamation? Damning evidence that Idaho CPS, Meridian Police and St. Luke's Hospital wrongfully took a baby and will stop at nothing to silence. Check this video out for more evidence. They even lied to the jury!	<a href="https://twitter.com/i/status/1702187197741334757">https://twitter.com/i/status/1702187197741334757</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1702187197741334757">https://twitter.com/RealABundy/status/1702187197741334757</a>	2/16/2024	D, I, J, N, O, V
E61	9/29/2023	The truth will prevail, just as it always has	<a href="https://twitter.com/RealABundy/status/1707959883138465920">https://twitter.com/RealABundy/status/1707959883138465920</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1707959883138465920">https://twitter.com/RealABundy/status/1707959883138465920</a>	2/16/2024	U
E62	9/29/2023	The truth will prevail, just as it always has	<a href="https://twitter.com/i/status/1707959883138465920">https://twitter.com/i/status/1707959883138465920</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1707959883138465920">https://twitter.com/RealABundy/status/1707959883138465920</a>	2/16/2024	U
E63	10/8/2023	Judges, Lawyers & Bureaucrats are destroying this country!	<a href="https://twitter.com/RealABundy/status/1711163533159723172">https://twitter.com/RealABundy/status/1711163533159723172</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1711163533159723172">https://twitter.com/RealABundy/status/1711163533159723172</a>	2/16/2024	J,
E64	10/8/2023	Judges, Lawyers & Bureaucrats are destroying this	<a href="https://twitter.com/i/status/1711163533159723172">https://twitter.com/i/status/1711163533159723172</a>	10/17/2023	<a href="https://twitter.com/RealABundy/status/1711163533159723172">https://twitter.com/RealABundy/status/1711163533159723172</a>	2/16/2024	J
E65	10/23/2023	They think that they can come into our homes!  The email:   Mr. Bundy,  In light of your e-mail of last night refusing to agree to a date and time, I'm serving on you a notice that unilaterally schedules the visit by the appraiser and me to your house on Thursday, October 26, at 10:00 a.m. Under the rules that govern these sorts of things, we're entitled to inspect the house because it's relevant to the lawsuit even though I know that wouldn't be your preference. My appraiser has told me the inspection will not last more than one hour.  Please confirm you will permit the inspection at that time. I scheduled it at a time when I assume your children will be at school.  I look forward to your anticipated cooperation then. Please let me know if you have any questions or concerns. Bob Faucher Holland & Hart RFaucher@hollandhart.com			<a href="https://twitter.com/RealABundy/status/1716683152515543145">https://twitter.com/RealABundy/status/1716683152515543145</a>	2/20/2024	
E66	10/23/2023	They think they can come inot our homes!			VIDEO	2/20/2024	
E67	11/1/2023	Forced Entry, Contempt Charges, Football Boys, Car Projects...10/24 Update			<a href="https://twitter.com/RealABundy/status/1719698428655993190">https://twitter.com/RealABundy/status/1719698428655993190</a>	2/20/2024	
E68	11/1/2023	Forced Entry, Contempt Charges, Football Boys, Car Projects...10/24 Update			VIDEO	2/20/2024	
E69	11/1/2023	Police LIED to take this baby from his mother!  Visit <a href="http://freedomman.org/cyrus">http://freedomman.org/cyrus</a> for the full story			<a href="https://twitter.com/RealABundy/status/1719911028924776848">https://twitter.com/RealABundy/status/1719911028924776848</a>	2/20/2024	
E70	11/1/2023	Police LIED to take this baby from his mother!  Visit <a href="http://freedomman.org/cyrus">http://freedomman.org/cyrus</a> for the full story			VIDEO	2/20/2024	




Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
E71	11/2/2023	The state taking children from parents is a serious matter. Should the courts be used to destitute a family for speaking against it? Here is what is happening to the Bundy family and why it is dangerous territory for all of us.  The Cost of Standing for a Baby  <a href="https://pplsrghts.org/43ecaf2b-41d2-4c94-8f80-0793ef7ce319">https://pplsrghts.org/43ecaf2b-41d2-4c94-8f80-0793ef7ce319</a>			<a href="https://twitter.com/RealABundy/status/1720131414790693013">https://twitter.com/RealABundy/status/1720131414790693013</a>	2/20/2024	
E72	11/8/2023	CPS took Cyrus from his loving parents and tried to give him to foster parents. Thousands of people fought to get him back and he was returned in 6 days!! Baby Cyrus is now happy and healthy in his parents' loving care!  Learn more here  <a href="http://freedomman.org/cyrus">http://freedomman.org/cyrus</a>			<a href="https://twitter.com/RealABundy/status/1722485923504439579">https://twitter.com/RealABundy/status/1722485923504439579</a>	2/20/2024	
E73	11/8/2023	CPS took Cyrus from his loving parents and tried to give him to foster parents. Thousands of people fought to get him back and he was returned in 6 days!! Baby Cyrus is now happy and healthy in his parents' loving care!  Learn more here  <a href="http://freedomman.org/cyrus">http://freedomman.org/cyrus</a>			VIDEO	2/20/2024	
E74	11/13/2023	Today Judge Baskin issued a \$250,000 warrant for my arrest. The only thing I care to say is that I don't regret any of it. I was honest in everything I said and getting Baby Cyrus back makes all of the trouble worth it. Please pray for my family.			<a href="https://twitter.com/RealABundy/status/1724248718352740798/photo/1">https://twitter.com/RealABundy/status/1724248718352740798/photo/1</a>	2/20/2024	
E75	11/21/2023	St. Luke's attorneys would love nothing more than for me to counter sue them. They would make thousands of dollars an hour for many more years. A complete win for them no matter how it goes. The other winner would be the attorneys we hire. We would need to raise hundred of thousands of dollars to pay them. When people lose interest and stoped donating I would be left to pay the legal expenses. Finally, I don't believe there is a court in Idaho that would rule for the people and against the establishment.  I did not ask for people to donate to counter sue St. Luke's. That link was posted by someone who had access to my social media accounts. I just found out about it today.  If you wish to be refunded then I will ask the person who collected the funds to return it. Sorry for the confusion!			<a href="https://twitter.com/RealABundy/status/1727076810330964336">https://twitter.com/RealABundy/status/1727076810330964336</a>	2/20/2024	
E76	12/1/2023	My response to the Atlantic Report: This case has been very intense on both sides. Many people on each side have said terrible things. It is dishonest for a reporter to take the anonymous words in a single voice mail or email and try to make it look like the mainstream. Jacob knows better than to do this. However, I'm not surprised as he is the son of two D.C. lawyers and works for a liberal rag. @TheAtlantic #idpol #idleg #savebabycyrus #takecareofmaya			<a href="https://twitter.com/RealABundy/status/1730747287091945524">https://twitter.com/RealABundy/status/1730747287091945524</a>	2/20/2024	
E77	12/2/2023	St. Luke's Health System and CEO Chris Roth have officially taken ownership of my home and farm in Emmett. My family and I had many amazing memories there and it is very sad to us. When I purchased the home nearly a decade ago we dreamed of living in Emmett the rest of our lives. I pray that the Lord will bless my family with peace. I don't want to withhold anything from the Lord and I don't regret standing for baby Cyrus, but the cost has been terrible. I somehow believed that if I kept beating the drum of truth something would break loose and this attack on my family and I would not prevail. Losing our home hurts. Speaking out against the rich and powerful in the United States is expensive and dangerous.			<a href="https://twitter.com/RealABundy/status/1731046034904629476">https://twitter.com/RealABundy/status/1731046034904629476</a>	2/20/2024	
E78	12/4/2023	St. Luke's Health System took my home. Who are they and what does this mean for Idahoans? #idpol #idleg #savebabycyrus #takecareofmaya			<a href="https://twitter.com/RealABundy/status/1731783290816745769">https://twitter.com/RealABundy/status/1731783290816745769</a>	2/20/2024	



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E79	12/4/2023	St. Luke's Health System took my home. Who are they and what does this mean for Idahoans? #idpol #idleg #savebabycyrus #takecareofmaya			VIDEO	2/20/2024	
E80	12/21/2023	Until we defend each other, and I'm not talking in some de-facto court, we will be reduced to nothing. Fighting any other way is a waste of time and resources. People want to be popular and ask for other people's money. They claim to have the solution and that they are fighting the right way but it has all gone astray. As a people we must build a physical defense against the wicked or they will keep taking until everyone has nothing left. Just simply history.  <a href="https://youtube.com/live/UfYyeN7Qlhw?si=IslaOOVnpeVegIL_">https://youtube.com/live/UfYyeN7Qlhw?si=IslaOOVnpeVegIL_</a>			<a href="https://twitter.com/RealABundy/status/1738079030258114974">https://twitter.com/RealABundy/status/1738079030258114974</a>	2/20/2024	
E81	12/21/2023	Until we defend each other, and I'm not talking in some de-facto court, we will be reduced to nothing.			<a href="https://twitter.com/RealABundy/status/1738079030258114974">https://twitter.com/RealABundy/status/1738079030258114974</a>	2/20/2024	
E82	12/22/2023	The loss of freedom is synonymous with the consolidation of power. For Idahoans, healthcare services are becoming a massive colossus under the control of a single entity. This same power is controlling much of Idaho's government agencies and funding. St. Lukes Executives and Board of Directors are controlling much more than hospitals.  For more info click here  <a href="https://nislworgrow.org/slog-blog/south-idaho-healthcare-colossus-st-luke">https://nislworgrow.org/slog-blog/south-idaho-healthcare-colossus-st-luke</a>  #idleg #savebabycyrus #idpol			<a href="https://twitter.com/RealABundy/status/1738414694413590567">https://twitter.com/RealABundy/status/1738414694413590567</a>	2/20/2024	
E83	12/28/2023	Update on the money St. Luke's CEO stole right before Christmas			<a href="https://twitter.com/RealABundy/status/1740586269804277954">https://twitter.com/RealABundy/status/1740586269804277954</a>	2/20/2024	
E84	12/28/2023	Update on the money St. Luke's CEO stole right before Christmas			VIDEO	2/20/2024	
E85	1/6/2024	The Idaho good old boys make millions off of sex change surgeries on children. They are pushing a transgender/homosexual agenda in Idaho. I have exposed these people many times and they hate me for it. So, they use the liberal courts to financially destroy and try to silence me. Here is a good example of what I do to make them so motivated to silence me. <a href="https://youtu.be/c3pyzErrj08?si=xxGT9i0oEjhWnZZ">https://youtu.be/c3pyzErrj08?si=xxGT9i0oEjhWnZZ</a>			<a href="https://twitter.com/RealABundy/status/1743868545405001854">https://twitter.com/RealABundy/status/1743868545405001854</a>	2/20/2024	
E86	1/6/2024	The Idaho good old boys make millions off of sex change surgeries on children.			VIDEO	2/20/2024	
E87	1/8/2024	Idaho Judge, Nancy Baskin, issued a \$250,000 warrant for Ammon Bundy's arrest for publishing this video and others like it.  The Idaho good old boys will do just about anything to silence those who oppose their authoritarian agenda. They believe they have the power to take anything they wish away, including babies from parents.  Youtube was ordered by St. Luke's attorney to take this video down. After making minor edits to satisfy YouTube we republished it. <a href="https://youtu.be/i2CNNyZGT8?si=5TqfDyFbm0laaWN-">https://youtu.be/i2CNNyZGT8?si=5TqfDyFbm0laaWN-</a>  Long Live the Truth!			<a href="https://twitter.com/RealABundy/status/1744424938373558378">https://twitter.com/RealABundy/status/1744424938373558378</a>	2/20/2024	
E88	1/8/2024	Idaho Judge, Nancy Baskin, issued a \$250,000 warrant for Ammon Bundy's arrest for publishing this video and others like it.			VIDEO	2/20/2024	
E89	1/9/2024	They took a baby, got paid and lied about it!  CPS Agents, Meriden Police, St. Lukes Medical Staff FLAT-OUT lied about why they took Baby Cyrus. Here is the evidence. Then they got their attorneys to try and cover it all up using the courts.			<a href="https://twitter.com/RealABundy/status/1744791268662591781">https://twitter.com/RealABundy/status/1744791268662591781</a>	2/20/2024	

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
E90	1/9/2024	They took a baby, got paid and lied about it!  CPS Agents, Meriden Police, St. Lukes Medical Staff FLAT-OUT lied about why they took Baby Cyrus. Here is the evidence. Then they got their attorneys to try and cover it all up using the courts.			VIDEO	2/20/2024	
E91	2/22/2024	They took a baby from loving parents because they missed one doctor's appointment!			<a href="https://twitter.com/RealABundy/status/1760922054390382834">https://twitter.com/RealABundy/status/1760922054390382834</a>	2/20/2024	
E92	2/22/2024	They took a baby from loving parents because they missed one doctor's appointment!			VIDEO	2/20/2024	
E93	2/23/2023	Imagine your child or grandchild gets sick and you are doing all you can to care for him, but a doctor calls Child Protection Services because you miss a medical appointment. CPS uses this missed medical appointment as a reason to take your child away and the police come in force and rip your child from your arms. This could happen to anyone.			<a href="https://twitter.com/RealABundy/status/1760924034940772556">https://twitter.com/RealABundy/status/1760924034940772556</a>	3/9/2024	
E94	2/26/2024	Want to Know where Ammon Bundy is?			<a href="https://twitter.com/RealABundy/status/1762304969590419865">https://twitter.com/RealABundy/status/1762304969590419865</a>	2/28/2024	
E95	2/26/2024	Want to Know where Ammon Bundy is?			VIDEO	2/28/2024	
E96	2/29/2024	This is what POLITICAL CORRUPTION looks like! Everyone knows that the BLM (Bureau of Land Management) and the FBI hate the Bundys. So why was Judge Lynn Norton assigned to preside over the St. Luke's lawsuit? Also why was the FBI behind the scenes manipulating St. Luke's after Baby Cyrus was taken?			<a href="https://twitter.com/RealABundy/status/1763431080927932734">https://twitter.com/RealABundy/status/1763431080927932734</a>	3/8/2024	
E97	2/29/2024	This is what POLITICAL CORRUPTION looks like! Everyone knows that the BLM (Bureau of Land Management) and the FBI hate the Bundys. So why was Judge Lynn Norton assigned to preside over the St. Luke's lawsuit? Also why was the FBI behind the scenes manipulating St. Luke's after Baby Cyrus was taken?			VIDEO	3/8/2024	
E98	3/4/2024	I will give you \$10,000 cash on one condition.			<a href="https://twitter.com/RealABundy/status/1764897589982384450">https://twitter.com/RealABundy/status/1764897589982384450</a>	3/8/2024	
E99	3/4/2024	I will give you \$10,000 cash on one condition.			VIDEO	3/29/2024	
E100	3/14/2024	I have been asked this several times.  "Why did you not mobilize PRN to defend your house that St Luke's seized? Like you defended the Bundy Ranch before."  Here is my answer: ....			<a href="https://twitter.com/RealABundy/status/1768305866304827692">https://twitter.com/RealABundy/status/1768305866304827692</a>	3/29/2024	



Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
F1		Link to Instagram page	<a href="https://www.instagram.com/realammonbundy/">https://www.instagram.com/realammonbundy/</a>	10/7/2023	<a href="https://www.instagram.com/realammonbundy/">https://www.instagram.com/realammonbundy/</a>	2/19/2024	
F2	2/13/2023	St. Luke's hospital executives are seeking \$7.5 million in punitive damages	<a href="https://www.instagram.com/p/ColvELJugUR/">https://www.instagram.com/p/ColvELJugUR/</a>	10/13/2023	<a href="https://www.instagram.com/p/ColvELJugUR/">https://www.instagram.com/p/ColvELJugUR/</a>	2/19/2024	C, K
F3	2/13/2023	St. Luke's hospital executives are seeking \$7.5 million in punitive damages	Video	10/13/2023			C, K
F4	5/3/2023	I joined Sam Bushman on Liberty Roundtable to discuss the facts about the Baby Cyrus story and the St. Luke's lawsuit	<a href="https://www.instagram.com/p/CrzdXlfvILB/">https://www.instagram.com/p/CrzdXlfvILB/</a>	10/13/2023	<a href="https://www.instagram.com/p/CrzdXlfvILB/">https://www.instagram.com/p/CrzdXlfvILB/</a>	2/19/2024	A, B, C, H, M, O, P, S, U
F5	5/3/2023	I joined Sam Bushman on Liberty Roundtable to discuss the facts about the Baby Cyrus story and the St. Luke's lawsuit	Video	10/13/2023			A, B, C, H, M, O, P, S, U
F6	5/4/2023	Chris Roth (CEO of St. Luke's), my offer still stands. My offer to give you everything I own has not changed. ....	<a href="https://www.instagram.com/p/Cr13BL9NayI/">https://www.instagram.com/p/Cr13BL9NayI/</a>	10/13/2023	<a href="https://www.instagram.com/p/Cr13BL9NayI/">https://www.instagram.com/p/Cr13BL9NayI/</a>	2/19/2024	J
F7	5/4/2023	Chris Roth (CEO of St. Luke's), my offer still stands. My offer to give you everything I own has not changed. ....	Video	10/13/2023			J
F8	5/7/2023	I don't mind being called a radical, but what's the truth?	<a href="https://www.instagram.com/p/Cr90Zw9PmBt/">https://www.instagram.com/p/Cr90Zw9PmBt/</a>	10/13/2023	<a href="https://www.instagram.com/p/Cr90Zw9PmBt/">https://www.instagram.com/p/Cr90Zw9PmBt/</a>	2/19/2024	A, C
F9	5/7/2023	I don't mind being called a radical, but what's the truth?	Video	10/13/2023			A, C
F10	5/9/2023	Great discussion with Stew Peters about the Baby Cyrus case and the St. Luke's lawsuit.	<a href="https://www.instagram.com/p/CsDnrlcpSeK/">https://www.instagram.com/p/CsDnrlcpSeK/</a>	10/13/2023	<a href="https://www.instagram.com/p/CsDnrlcpSeK/">https://www.instagram.com/p/CsDnrlcpSeK/</a>	2/19/2024	A, B, C, E, J, K, U
F11	5/9/2023	Great discussion with Stew Peters about the Baby Cyrus case and the St. Luke's lawsuit.	Video	10/13/2023			A, B, C, E, J, K, U
F12	5/10/2023	You won't want to miss this! Happening TODAY - May 10th. If you want to hear all of the accurate details from the Baby Cyrus case.	<a href="https://www.instagram.com/p/CsEq3GI0cqM/?img_index=1">https://www.instagram.com/p/CsEq3GI0cqM/?img_index=1</a>	10/13/2023	<a href="https://www.instagram.com/p/CsEq3GI0cqM/?img_index=1">https://www.instagram.com/p/CsEq3GI0cqM/?img_index=1</a>	2/19/2024	A, B, C, E, G, K, M
F13	5/15/2023	Letter to Erik Stidham (St. Luke's Lead Attorney) from Ammon Bundy -	<a href="https://www.instagram.com/p/CsRn27Hpmbt/?img_index=1">https://www.instagram.com/p/CsRn27Hpmbt/?img_index=1</a>	10/13/2023	<a href="https://www.instagram.com/p/CsRn27Hpmbt/?img_index=1">https://www.instagram.com/p/CsRn27Hpmbt/?img_index=1</a>	2/19/2024	A, C, H, K, O, P
F14	5/19/2023	It's like David & Goliath, quick but detailed update video on the Ammon Bundy/St. Luke's case by Bryan Hyde.	<a href="https://www.instagram.com/p/CscBF4NpPPG/">https://www.instagram.com/p/CscBF4NpPPG/</a>	10/13/2023	<a href="https://www.instagram.com/p/CscBF4NpPPG/">https://www.instagram.com/p/CscBF4NpPPG/</a>	2/19/2024	A, C, H, O, P, V
F15	5/19/2023	It's like David & Goliath, quick but detailed update video on the Ammon Bundy/St. Luke's case by Bryan Hyde.	Video	10/13/2023			A, C, H, O, P, V
F16	5/23/2023	One visit to the doctor and the Anderson's happy life of joy and love turned into their worst nightmare. ...This could happen to anybody, don't be alone when it doesd. Join PeoplesRights.org	<a href="https://www.instagram.com/p/CslzU6nPpEK/">https://www.instagram.com/p/CslzU6nPpEK/</a>	10/13/2023	<a href="https://www.instagram.com/p/CslzU6nPpEK/">https://www.instagram.com/p/CslzU6nPpEK/</a>	2/19/2024	A, B, C, E, H, J, K, U
F17	5/23/2023	One visit to the doctor and the Anderson's happy life of joy and love turned into their worst nightmare. ...This could happen to anybody, don't be alone when it doesd. Join PeoplesRights.org	Video	10/13/2023			A, B, C, E, H, J, K, U
F18	5/24/2023	Due to the Andersons being part of the Peoples Rights Network, neighbors united in defense of the family, and baby Cyrus was returned to his parents in 6 days. .... This could happen to anybody, don't be alone when it does. Join PeoplesRights.org	<a href="https://www.instagram.com/p/CsozemepjRR/">https://www.instagram.com/p/CsozemepjRR/</a>	10/13/2023	<a href="https://www.instagram.com/p/CsozemepjRR/">https://www.instagram.com/p/CsozemepjRR/</a>	2/19/2024	J, K, M, O, P
F19	5/24/2023	Due to the Andersons being part of the Peoples Rights Network, neighbors united in defense of the family, and baby Cyrus was returned to his parents in 6 days. .... This could happen to anybody, don't be alone when it does. Join PeoplesRights.org	Video	10/13/2023			J, K, M, O, P
F20	5/28/2023	This time last year, Diego and I celebrated CPS' reluctant return of Diego's grandson Cyrus. However since then we have bee hunted like the early day reformers and are now both fugitives of the law. ....	<a href="https://www.instagram.com/p/Csyn7ypuCPt/">https://www.instagram.com/p/Csyn7ypuCPt/</a>	10/13/2023	<a href="https://www.instagram.com/p/Csyn7ypuCPt/">https://www.instagram.com/p/Csyn7ypuCPt/</a>	2/19/2024	A, C, J, U
F21	5/30/2023	St. Luke was a doctor; a healer. Hospitals all around the world use his name for their medical facilities. Baby Cyrus, his mother, and his father went there for help and it ended up being a nightmare. This isn't what St. Luke would have wanted. Hospitals were meant to help, not hurt.	<a href="https://www.instagram.com/p/Cs5Ky98OI-k/">https://www.instagram.com/p/Cs5Ky98OI-k/</a>	10/13/2023	<a href="https://www.instagram.com/p/Cs5Ky98OI-k/">https://www.instagram.com/p/Cs5Ky98OI-k/</a>	2/19/2024	K, O, P
F22	5/30/2023	St. Luke was a doctor; a healer. Hospitals all around the world use his name for their medical facilities. Baby Cyrus, his mother, and his father went there for help and it ended up being a nightmare. This isn't what St. Luke would have wanted. Hospitals were meant to help, not hurt.	Video	10/13/2023			K, O, P
F23	6/13/2023	Update from June 7, 2023. St. Luke's and Holland & Hart are trying to make an example out of Diego and I by sying us for 7.5 million dollars for speaking out when Baby Cyrus was taken. ...	<a href="https://www.instagram.com/p/CtdaG5qR7vh/">https://www.instagram.com/p/CtdaG5qR7vh/</a>	10/13/2023	<a href="https://www.instagram.com/p/CtdaG5qR7vh/">https://www.instagram.com/p/CtdaG5qR7vh/</a>	2/19/2024	A, B, C, D, E, G, H, I, J, K, M

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F24	6/13/2023	Update from June 7, 2023. St. Luke's and Holland & Hart are trying to make an example out of Diego and I by sying us for 7.5 million dollars for speaking out when Baby Cyrus was taken. ...	Video	10/13/2023			A, B, C, D, E, G, H, I, J, K, M
F25	6/14/2023	Update from June 8, 2023. Gem County Sheriff's Deputies showed up to my home once more proving that they will continue to terrorize my family.	<a href="https://www.instagram.com/p/Ctec2DaxWIB/">https://www.instagram.com/p/Ctec2DaxWIB/</a>	10/13/2023	<a href="https://www.instagram.com/p/Ctec2DaxWIB/">https://www.instagram.com/p/Ctec2DaxWIB/</a>	2/19/2024	A, B, C, J, K
F26	6/14/2023	Update from June 8, 2023. Gem County Sheriff's Deputies showed up to my home once more proving that they will continue to terrorize my family.	Video	10/13/2023			A, B, C, J, K
F27	6/25/2023	St. Luke's CEO Chris Roth just billed Diego and I \$18,103.20 because we appealed to the federal courts.	<a href="https://www.instagram.com/p/Ct6sj6Dv2_V/">https://www.instagram.com/p/Ct6sj6Dv2_V/</a>	10/13/2023	<a href="https://www.instagram.com/p/Ct6sj6Dv2_V/">https://www.instagram.com/p/Ct6sj6Dv2_V/</a>	2/19/2024	A, C, J,
F28	6/25/2023	St. Luke's CEO Chris Roth just billed Diego and I \$18,103.20 because we appealed to the federal courts.	Video	10/13/2023			A, C, J,
F29	7/10/2023	Letter to Judge Baskin from Ammon Bundy	<a href="https://www.instagram.com/p/CuiRsISjd18/">https://www.instagram.com/p/CuiRsISjd18/</a>	10/13/2023	<a href="https://www.instagram.com/p/CuiRsISjd18/">https://www.instagram.com/p/CuiRsISjd18/</a>	2/19/2024	A, B, C, E, G, J, K, O, P, T, U
F30	7/18/2023	If they didn't steal Baby Cyrus none of this would have happened. ...	<a href="https://www.instagram.com/p/Cu2RAmXpU6m/">https://www.instagram.com/p/Cu2RAmXpU6m/</a>	10/13/2023	<a href="https://www.instagram.com/p/Cu2RAmXpU6m/">https://www.instagram.com/p/Cu2RAmXpU6m/</a>	2/19/2024	A, C, E, H, K, O, P
F31	7/18/2023	If they didn't steal Baby Cyrus none of this would have happened. ...	Video	10/13/2023			A, C, E, H, K, O, P
F32	7/27/2023	4 Reasons I Have Not Defended Myself in the Court	<a href="https://www.instagram.com/p/CvOVqCZtoJ6/">https://www.instagram.com/p/CvOVqCZtoJ6/</a>	10/13/2023	<a href="https://www.instagram.com/p/CvOVqCZtoJ6/">https://www.instagram.com/p/CvOVqCZtoJ6/</a>	2/19/2024	
F33	7/27/2023	4 Reasons I Have Not Defended Myself in the Court	<a href="https://www.instagram.com/p/CvOVqCZtoJ6/">https://www.instagram.com/p/CvOVqCZtoJ6/</a>	10/13/2023	<a href="https://www.instagram.com/p/CvOVqCZtoJ6/">https://www.instagram.com/p/CvOVqCZtoJ6/</a>	2/19/2024	
F34	7/29/2023	St. Luke's Children's Hospital webpage is still advertising minor hormone therapy and sex change surgeries. This video gives proof. ...	<a href="https://www.instagram.com/p/CvS_wupNPC_/">https://www.instagram.com/p/CvS_wupNPC_/</a>	10/13/2023	<a href="https://www.instagram.com/p/CvS_wupNPC_/">https://www.instagram.com/p/CvS_wupNPC_/</a>	2/19/2024	A, C, F, J, L
F35	7/29/2023	St. Luke's Children's Hospital webpage is still advertising minor hormone therapy and sex change surgeries. This video gives proof. ...	Video	10/13/2023			A, C, F, J, L
F36	8/9/2023	St. Luke's executives, lawyers, & witnesses lied to the jury many times. Here are a few examples of them lying to the jury. ...	<a href="https://www.instagram.com/p/CvvnUc-tNEd/">https://www.instagram.com/p/CvvnUc-tNEd/</a>	10/13/2023	<a href="https://www.instagram.com/p/CvvnUc-tNEd/">https://www.instagram.com/p/CvvnUc-tNEd/</a>	2/19/2024	H, I, O
F37	8/9/2023	St. Luke's executives, lawyers, & witnesses lied to the jury many times. Here are a few examples of them lying to the jury. ...	Video	10/13/2023			H, I, O
F38	8/13/2023	Please watch: This is why Ammon Bundy was arrested. SAVING BABY CYRUS video.	<a href="https://www.instagram.com/p/Cv37mu2tZDT/">https://www.instagram.com/p/Cv37mu2tZDT/</a>	10/13/2023	<a href="https://www.instagram.com/p/Cv37mu2tZDT/">https://www.instagram.com/p/Cv37mu2tZDT/</a>	2/19/2024	J, K, M, O, P
F39	8/13/2023	Please watch: This is why Ammon Bundy was arrested. SAVING BABY CYRUS video.	Video	10/13/2023			J, K, M, O, P
F40	8/13/2023	I made it home on a \$10,000 bond. Thanks for all the prayers. I wonde rif they will ever leave my family alone? This could happen to you.	<a href="https://www.instagram.com/p/Cv6Eq83NxJt/">https://www.instagram.com/p/Cv6Eq83NxJt/</a>	10/13/2023	<a href="https://www.instagram.com/p/Cv6Eq83NxJt/">https://www.instagram.com/p/Cv6Eq83NxJt/</a>	2/19/2024	A, B, C, E, H, J, K, U
F41	8/13/2023	I made it home on a \$10,000 bond. Thanks for all the prayers. I wonde rif they will ever leave my family alone? This could happen to you.	Video	10/13/2023			A, B, C, E, H, J, K, U
F42	8/14/2023	Evidence that CPS Agents, Meridian Police & St. Luke's Staff LIED about why they took Baby Cyrus	<a href="https://www.instagram.com/p/Cv8aZtkplih/">https://www.instagram.com/p/Cv8aZtkplih/</a>	10/13/2023	<a href="https://www.instagram.com/p/Cv8aZtkplih/">https://www.instagram.com/p/Cv8aZtkplih/</a>	2/19/2024	A, B, G, H, J, M, N, O, P
F43	8/14/2023	Evidence that CPS Agents, Meridian Police & St. Luke's Staff LIED about why they took Baby Cyrus	Video	10/13/2023			A, B, G, H, J, M, N, O, P
F44	8/16/2023	I don't think Idaho is a place for lying doctors, lawyers, executives and reporters. I hope they'll go somewhere else to do their lying	<a href="https://www.instagram.com/p/CwBqvyGtpA_/">https://www.instagram.com/p/CwBqvyGtpA_/</a>	10/13/2023	<a href="https://www.instagram.com/p/CwBqvyGtpA_/">https://www.instagram.com/p/CwBqvyGtpA_/</a>	2/19/2024	H, I, O
F45	8/16/2023	I don't think Idaho is a place for lying doctors, lawyers, executives and reporters. I hope they'll go somewhere else to do their lying	Video	10/13/2023			H, I, O

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
F46	8/28/2023	Recent Letter to Erik Stidham, Lead St. Luke's Attorney	<a href="https://www.instagram.com/p/CwgAuOSpZyl/">https://www.instagram.com/p/CwgAuOSpZyl/</a>	10/7/2023	<a href="https://www.instagram.com/p/CwgAuOSpZyl/">https://www.instagram.com/p/CwgAuOSpZyl/</a>	2/19/2024	J, K, U
F47	8/30/2023	I'm not going anywhere...	<a href="https://www.instagram.com/p/Cwk-0XMNCA7/">https://www.instagram.com/p/Cwk-0XMNCA7/</a>	10/7/2023	<a href="https://www.instagram.com/p/Cwk-0XMNCA7/">https://www.instagram.com/p/Cwk-0XMNCA7/</a>	2/19/2024	H, J, K, N, O, V
F48	8/30/2023	I'm not going anywhere...	Video	10/7/2023			H, J, K, N, O, V
F49	9/13/2023	This is one of the saddest things I've seen in a long time	<a href="https://www.instagram.com/p/CxKLdonO-Uz/">https://www.instagram.com/p/CxKLdonO-Uz/</a>	10/7/2023	<a href="https://www.instagram.com/p/CxKLdonO-Uz/">https://www.instagram.com/p/CxKLdonO-Uz/</a>	2/19/2024	J
F50	9/13/2023	This is one of the saddest things I've seen in a long time	Video	10/7/2023			J
F51	9/13/2023	Will They Kill to Silence? Is this Really about Defamation?	<a href="https://www.instagram.com/p/CxKPSFuOCXD/">https://www.instagram.com/p/CxKPSFuOCXD/</a>	10/7/2023	<a href="https://www.instagram.com/p/CxKPSFuOCXD/">https://www.instagram.com/p/CxKPSFuOCXD/</a>	2/19/2024	H, I, K, N, O, P, V
F52	9/13/2023	Will They Kill to Silence? Is this Really about Defamation?	Video	10/7/2023			H, I, K, N, O, P, V
F53	9/29/2023	The truth will prevail, just as it always has	<a href="https://www.instagram.com/p/CxzPCPYNoRa/">https://www.instagram.com/p/CxzPCPYNoRa/</a>	10/7/2023	<a href="https://www.instagram.com/p/CxzPCPYNoRa/">https://www.instagram.com/p/CxzPCPYNoRa/</a>	2/19/2024	H, K, U
F54	9/29/2023	The truth will prevail, just as it always has	Video	10/7/2023			H, K, U
F55	10/8/2023	Judges, Lawyers & Bureaucrats are destroying this country!	<a href="https://www.instagram.com/p/CyKBhqiNucu/">https://www.instagram.com/p/CyKBhqiNucu/</a>	10/7/2023	<a href="https://www.instagram.com/p/CyKBhqiNucu/">https://www.instagram.com/p/CyKBhqiNucu/</a>	2/19/2024	A, G, J
F56	10/8/2023	Judges, Lawyers & Bureaucrats are destroying this country!	Video	10/7/2023			A, G, J
F57	10/23/2023	They think that they can come into our homes!			<a href="https://www.instagram.com/p/CyxPH53M5wU/">https://www.instagram.com/p/CyxPH53M5wU/</a>	2/23/2024	
F58	10/23/2023	They think that they can come into our homes!			Video		3/9/2024
F59	11/1/2023	Police LIED to take this baby from his mother!			<a href="https://www.instagram.com/p/CzlGnqPtrnw/">https://www.instagram.com/p/CzlGnqPtrnw/</a>	2/22/2024	
F60	11/1/2023	Police LIED to take this baby from his mother!			Video		3/9/2024
F61	11/1/2023	Forced Entry, Contempt Charges, Football Boys, Car Projects...10/24 Update			<a href="https://www.instagram.com/p/CzGnTB0m7H/">https://www.instagram.com/p/CzGnTB0m7H/</a>	2/23/2024	
F62	11/1/2023	Forced Entry, Contempt Charges, Football Boys, Car Projects...10/24 Update			Video		3/9/2024
F63	11/2/2023	The state taking children from parents is a serious matter			<a href="https://www.instagram.com/p/CzJ8lhHpr8v/">https://www.instagram.com/p/CzJ8lhHpr8v/</a>	2/22/2024	
F64	11/8/2023	CPS took Cyrus from his loving parents and tried to give him to foster parents.			<a href="https://www.instagram.com/p/CzacwbDOLcx/">https://www.instagram.com/p/CzacwbDOLcx/</a>	3/9/2024	
F65	11/8/2023	CPS took Cyrus from his loving parents and tried to give him to foster parents.			Video		3/9/2024
F66	11/13/2023	Today Judge Baskin issued a \$250,000 warrant for my arrest.			<a href="https://www.instagram.com/p/Czm_QIBNt7V/?img_index=1">https://www.instagram.com/p/Czm_QIBNt7V/?img_index=1</a>	3/9/2024	
F67	12/1/2023	My response to the Atlantic Report: This case has been very intense on both sides.			<a href="https://www.instagram.com/p/C0VHb-ht4XU/">https://www.instagram.com/p/C0VHb-ht4XU/</a>	3/9/2024	
F68	12/2/2023	St. Luke's Health System and CEO Chris Roth have officially taken ownership of my home and farm in Emmett.			<a href="https://www.instagram.com/p/C0XSKAJCJe/">https://www.instagram.com/p/C0XSKAJCJe/</a>	3/9/2024	
F69	12/4/2023	St. Luke's Health System took my home. Who are they and what does this mean for Idahoans?			<a href="https://www.instagram.com/p/C0ciMhfpL6r/">https://www.instagram.com/p/C0ciMhfpL6r/</a>	3/9/2024	
F70	12/4/2023	St. Luke's Health System took my home. Who are they and what does this mean for Idahoans?			Video		3/9/2024
F71	12/21/2023	Until we defend each other, and I'm not talking in some de-facto court, we will be reduced to nothing			<a href="https://www.instagram.com/p/C1JRDf3uk7w/">https://www.instagram.com/p/C1JRDf3uk7w/</a>	3/9/2024	
F72	12/21/2023	Until we defend each other, and I'm not talking in some de-facto court, we will be reduced to nothing			Video		3/9/2024
F73	12/22/2023	The loss of freedom is synonymous with the consolidation of power. For Idahoans, healthcare services are becoming a massive colossus under the control of a single entity			<a href="https://www.instagram.com/p/C1IozmN0qf/">https://www.instagram.com/p/C1IozmN0qf/</a>	3/9/2024	
F74	12/28/2023	Update on the money St. Lukes CEO stole right before Christmas			<a href="https://www.instagram.com/p/C1bEFpUt9Qf/">https://www.instagram.com/p/C1bEFpUt9Qf/</a>	3/9/2024	
F75	12/28/2023	Update on the money St. Lukes CEO stole right before Christmas			Video		3/9/2024
F76	12/29/2023	So Sorry the last video was cut off. Here's the full version! Update on the money St.Lukes CEO stole right before christmas			<a href="https://www.instagram.com/p/C1clcpoupBQ/">https://www.instagram.com/p/C1clcpoupBQ/</a>	3/9/2024	
F77	12/29/2023	So Sorry the last video was cut off. Here's the full version! Update on the money St.Lukes CEO stole right before christmas			Video		3/9/2024
F78	1/6/2024	The Idaho good ol boys make millions off of sex change surgeries on children.			<a href="https://www.instagram.com/p/C1vXmdDNtKI/">https://www.instagram.com/p/C1vXmdDNtKI/</a>	3/9/2024	
F79	1/6/2024	The Idaho good ol boys make millions off of sex change surgeries on children.			Video		3/9/2024
F80	1/8/2024	Idaho Judge, Nancy Baskin issued a \$250,000 warrant for Ammon Bundy's arrest for publishing this video and others like it			<a href="https://www.instagram.com/p/C12TfNzugh1/">https://www.instagram.com/p/C12TfNzugh1/</a>	3/9/2024	
F81	1/8/2024	Idaho Judge, Nancy Baskin issued a \$250,000 warrant for Ammon Bundy's arrest for publishing this video and others like it			Video		3/9/2024
F82	1/9/2024	They took a baby, got paid and lied about it!			<a href="https://www.instagram.com/p/C147XGpW9r/">https://www.instagram.com/p/C147XGpW9r/</a>	3/9/2024	
F83	1/9/2024	They took a baby, got paid and lied about it!			Video		3/9/2024

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F84	2/23/2024	Imagine your child or grandchild gets sick and you are doing all you can to care for him, but a doctor calls Child Protection Services because you miss a medical appointment			<a href="https://www.instagram.com/p/C3rmlEpOA_a/">https://www.instagram.com/p/C3rmlEpOA_a/</a>	3/9/2024	
F85	2/23/2024	Imagine your child or grandchild gets sick and you are doing all you can to care for him, but a doctor calls Child Protection Services because you miss a medical appointment			Video	3/9/2024	
F86	2/26/2024	Want to know where Ammon Bundy is?			<a href="https://www.instagram.com/p/C31Xvp9thvP/">https://www.instagram.com/p/C31Xvp9thvP/</a>	3/9/2024	
F87	2/26/2024	Want to know where Ammon Bundy is?			Video	3/9/2024	
F88	2/29/2024	This is what POLITICAL CORRUPTION looks like! Everyone knows that the BLM (Bureau of Land Management) and the FBI hate the Bundys. So why was Judge Lynn Norton assigned to preside over the St. Luke's lawsuit? Also why was the FBI behind the scenes manipulating St. Luke's after Baby Cyrus was taken?			<a href="https://www.instagram.com/p/C39YkkMtELk/">https://www.instagram.com/p/C39YkkMtELk/</a>		
F89	2/29/2024	This is what POLITICAL CORRUPTION looks like!			Video	3/9/2024	
F90	3/4/2024	I will give you \$10,000 cash on one condition.			<a href="https://www.instagram.com/p/C4HzNYzOE9m/">https://www.instagram.com/p/C4HzNYzOE9m/</a>	3/9/2024	
F91	3/4/2024	I will give you \$10,000 cash on one condition.			Video	3/9/2024	



Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
G1	3/16/2022	PROTEST DAILY FOR BABY CYRUS	<a href="https://www.peoplesrights.org/news_view/?protest-daily-for-baby-cyrus&amp;id=d4b882ff-aaa8-4769-bdff-0f6fd44cfc49&amp;pg=6">https://www.peoplesrights.org/news_view/?protest-daily-for-baby-cyrus&amp;id=d4b882ff-aaa8-4769-bdff-0f6fd44cfc49&amp;pg=6</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?protest-daily-for-baby-cyrus&amp;id=d4b882ff-aaa8-4769-bdff-0f6fd44cfc49&amp;pg=6">https://www.peoplesrights.ws/news_view/?protest-daily-for-baby-cyrus&amp;id=d4b882ff-aaa8-4769-bdff-0f6fd44cfc49&amp;pg=6</a>	2/16/2024	H, J
G2	3/18/2022	CPS & Officers Kidnap Child, Multiple Arrests Made - Update 2 Is This Really Happening in Idaho?! The Anderson family was enjoying an evening at a friends house, with their young son, Cyrus, and other family members. On their way home last night, they noticed they were being followed by police, so pulled over at a gas station. Then, things got worse. Their son has been taken into State Custody, under (supposedly) medical supervision... because they committed the crime of missing a follow up appointment for an earlier hospital visit.	<a href="https://www.peoplesrights.org/news_view/?cps-officers-kidnap-child-multiple-arrests-made-is-this-really-happening-in-idaho&amp;id=d1839d85-6a65-43ad-87a6-4c47a7cd7177&amp;pg=6">https://www.peoplesrights.org/news_view/?cps-officers-kidnap-child-multiple-arrests-made-is-this-really-happening-in-idaho&amp;id=d1839d85-6a65-43ad-87a6-4c47a7cd7177&amp;pg=6</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?cps-officers-kidnap-child-multiple-arrests-made-is-this-really-happening-in-idaho&amp;id=d1839d85-6a65-43ad-87a6-4c47a7cd7177&amp;pg=6">https://www.peoplesrights.ws/news_view/?cps-officers-kidnap-child-multiple-arrests-made-is-this-really-happening-in-idaho&amp;id=d1839d85-6a65-43ad-87a6-4c47a7cd7177&amp;pg=6</a>	2/16/2024	A, J
G3	3/21/2022	IDAHO FREEDOM FAIR & PACT RALLY This Saturday the People's Right Network (PRN) and PACT will be having a Fair/Rally. People Against Child Trafficking (PACT) is a new organization founded by baby Cyrus' family. The event will start at NOON and then at 2pm we will break into the fair portion for a couple hours with booths and specialists teaching people how to be more self sufficient. At 4PM guest speakers will take the stage and empower you with a message you have never heard before. You will not want to miss their messages. All of this is taking place in the old warehouse where the People's Rights Network (PRN) began, 800 E Locust St, Emmett, Idaho 83617. See you Saturday!	<a href="https://www.peoplesrights.org/news_view/?idaho-freedom-fair-pact-rally&amp;id=4429380a-b7dc-4489-8a63-54349db36acc&amp;pg=5">https://www.peoplesrights.org/news_view/?idaho-freedom-fair-pact-rally&amp;id=4429380a-b7dc-4489-8a63-54349db36acc&amp;pg=5</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?idaho-freedom-fair-pact-rally&amp;id=4429380a-b7dc-4489-8a63-54349db36acc&amp;pg=5">https://www.peoplesrights.ws/news_view/?idaho-freedom-fair-pact-rally&amp;id=4429380a-b7dc-4489-8a63-54349db36acc&amp;pg=5</a>	2/16/2024	A, B, J, K
G4	5/20/2022	Ammon Bundy guest on Critical Disclosure Radio with James White on Brighteon Radio Ammon Bundy discusses Peoples Rights, his run for Idaho Governor and the pending lawsuit involving St. Luke's Hospital	<a href="https://www.peoplesrights.org/news_view/?ammon-bundy-guest-on-critical-disclosure-radio-with-james-white-on-brighteon-radio&amp;id=f4740fc5-6ad2-4c41-9a38-9e89cd481905&amp;pg=5">https://www.peoplesrights.org/news_view/?ammon-bundy-guest-on-critical-disclosure-radio-with-james-white-on-brighteon-radio&amp;id=f4740fc5-6ad2-4c41-9a38-9e89cd481905&amp;pg=5</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?ammon-bundy-guest-on-critical-disclosure-radio-with-james-white-on-brighteon-radio&amp;id=f4740fc5-6ad2-4c41-9a38-9e89cd481905&amp;pg=5">https://www.peoplesrights.ws/news_view/?ammon-bundy-guest-on-critical-disclosure-radio-with-james-white-on-brighteon-radio&amp;id=f4740fc5-6ad2-4c41-9a38-9e89cd481905&amp;pg=5</a>	2/16/2024	A, H, J, U
G5	1/21/2023	CALL TO ACTION - 5 Minutes STAND UP FOR AMMON Kangaroo Courts is Vicious and ruthless. Read Details below. Click Read	<a href="https://www.peoplesrights.org/news_view/?call-to-action-5-minutes-stand-up-for-ammon&amp;id=1e30207c-1636-48ba-aacc-19a20ecc84fa&amp;pg=4">https://www.peoplesrights.org/news_view/?call-to-action-5-minutes-stand-up-for-ammon&amp;id=1e30207c-1636-48ba-aacc-19a20ecc84fa&amp;pg=4</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?call-to-action-5-minutes-stand-up-for-ammon&amp;id=1e30207c-1636-48ba-aacc-19a20ecc84fa&amp;pg=4">https://www.peoplesrights.ws/news_view/?call-to-action-5-minutes-stand-up-for-ammon&amp;id=1e30207c-1636-48ba-aacc-19a20ecc84fa&amp;pg=4</a>	2/16/2024	
G6	1/23/2023	CTA - Ways to assist our neighbor, Ammon Bundy - Update 2 Ammon needs all of us right now, at this very moment, to do what we can to stand with him as his trespassing trial begins. He has stood for our rights on numerous occasions, and this time he stood for an innocent baby that was unjustly taken from his breastfeeding mother.	<a href="https://www.peoplesrights.org/news_view/?cta-ways-to-assist-our-neighbor-ammon-bundy&amp;id=ced66bb6-280e-4a1c-9b4e-6e6b1f66e10a&amp;pg=4">https://www.peoplesrights.org/news_view/?cta-ways-to-assist-our-neighbor-ammon-bundy&amp;id=ced66bb6-280e-4a1c-9b4e-6e6b1f66e10a&amp;pg=4</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?cta-ways-to-assist-our-neighbor-ammon-bundy&amp;id=ced66bb6-280e-4a1c-9b4e-6e6b1f66e10a&amp;pg=4">https://www.peoplesrights.ws/news_view/?cta-ways-to-assist-our-neighbor-ammon-bundy&amp;id=ced66bb6-280e-4a1c-9b4e-6e6b1f66e10a&amp;pg=4</a>	2/16/2024	J, K
G7	4/19/2023	St. Lukes Sues Gem County Sheriff While Judge Issues Warrant for Ammon Bundy's Arrest It is exhausting just keeping up with what is happening in this case. St. Lukes is sparing no expense to destroy Ammon Bundy and anyone who will not help them.	<a href="https://www.peoplesrights.org/news_view/?st-lukes-sues-gem-county-sheriff-while-judge-issues-warrant-for-ammon-bundy-s-arrest&amp;id=0cec03f2-bebd-4ff6-b6e9-45001ea50921&amp;pg=3">https://www.peoplesrights.org/news_view/?st-lukes-sues-gem-county-sheriff-while-judge-issues-warrant-for-ammon-bundy-s-arrest&amp;id=0cec03f2-bebd-4ff6-b6e9-45001ea50921&amp;pg=3</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?st-lukes-sues-gem-county-sheriff-while-judge-issues-warrant-for-ammon-bundy-s-arrest&amp;id=0cec03f2-bebd-4ff6-b6e9-45001ea50921&amp;pg=3">https://www.peoplesrights.ws/news_view/?st-lukes-sues-gem-county-sheriff-while-judge-issues-warrant-for-ammon-bundy-s-arrest&amp;id=0cec03f2-bebd-4ff6-b6e9-45001ea50921&amp;pg=3</a>	2/16/2024	
G8	4/20/2023	Bundy's Sheriff Caved to St. Lukes in Less than Two Days St. Lukes sicked their lawyers on Gem County Sheriff and he couldn't hold out for even two days.	<a href="https://www.peoplesrights.org/news_view/?bundy-s-sheriff-caved-to-st-lukes-in-less-than-two-days&amp;id=5d4194aa-df1d-4a87-acc5-5f160599969d&amp;pg=3">https://www.peoplesrights.org/news_view/?bundy-s-sheriff-caved-to-st-lukes-in-less-than-two-days&amp;id=5d4194aa-df1d-4a87-acc5-5f160599969d&amp;pg=3</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?bundy-s-sheriff-caved-to-st-lukes-in-less-than-two-days&amp;id=5d4194aa-df1d-4a87-acc5-5f160599969d&amp;pg=3">https://www.peoplesrights.ws/news_view/?bundy-s-sheriff-caved-to-st-lukes-in-less-than-two-days&amp;id=5d4194aa-df1d-4a87-acc5-5f160599969d&amp;pg=3</a>	2/16/2024	A, E, G, H, J, K, O, P, U
G9	4/21/2023	Bryan Hyde Dives Into How the Media Pathologies Freedom (MUST WATCH) Why are ideals like personal freedom and limited government portrayed as mental illness by the legacy media? The media's hatred of Ammon Bundy and love of big government raises serious questions. (This is a good one to SHARE with your friends)	<a href="https://www.peoplesrights.org/news_view/?bryan-hyde-dives-into-how-the-media-pathologies-freedom-must-watch&amp;id=668050a1-d190-4aa3-a4f8-4028cf1190bf&amp;pg=3">https://www.peoplesrights.org/news_view/?bryan-hyde-dives-into-how-the-media-pathologies-freedom-must-watch&amp;id=668050a1-d190-4aa3-a4f8-4028cf1190bf&amp;pg=3</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?bryan-hyde-dives-into-how-the-media-pathologies-freedom-must-watch&amp;id=668050a1-d190-4aa3-a4f8-4028cf1190bf&amp;pg=3">https://www.peoplesrights.ws/news_view/?bryan-hyde-dives-into-how-the-media-pathologies-freedom-must-watch&amp;id=668050a1-d190-4aa3-a4f8-4028cf1190bf&amp;pg=3</a>	2/16/2024	A, E, G, H, J, K, O, P, U
G10	4/28/2023	Big Jim Smith Interviews Ammon Bundy on the Nate Shelman Show If your trying to understand what is happening with Ammon Bundy then here is a good break-down of the event you can listen to.	<a href="https://www.peoplesrights.org/news_view/?big-jim-smith-interviews-ammon-bundy-on-the-nate-shelman-show&amp;id=d5af5adc-6b2d-4221-b469-b5791aef60ba&amp;pg=2">https://www.peoplesrights.org/news_view/?big-jim-smith-interviews-ammon-bundy-on-the-nate-shelman-show&amp;id=d5af5adc-6b2d-4221-b469-b5791aef60ba&amp;pg=2</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?big-jim-smith-interviews-ammon-bundy-on-the-nate-shelman-show&amp;id=d5af5adc-6b2d-4221-b469-b5791aef60ba&amp;pg=2">https://www.peoplesrights.ws/news_view/?big-jim-smith-interviews-ammon-bundy-on-the-nate-shelman-show&amp;id=d5af5adc-6b2d-4221-b469-b5791aef60ba&amp;pg=2</a>	2/16/2024	
G11	5/2/2023	Famous YouTuber James Freeman promotes PRN!! - Famous YouTuber James Freeman promotes PRN and rails ID CPS and ST. LUKES	<a href="https://www.peoplesrights.org/news_view/?famous-youtuber-james-freeman-promotes-prn&amp;id=3c5d8774-1ab1-44f0-992c-53f304b9010a&amp;pg=2">https://www.peoplesrights.org/news_view/?famous-youtuber-james-freeman-promotes-prn&amp;id=3c5d8774-1ab1-44f0-992c-53f304b9010a&amp;pg=2</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?famous-youtuber-james-freeman-promotes-prn&amp;id=3c5d8774-1ab1-44f0-992c-53f304b9010a&amp;pg=2">https://www.peoplesrights.ws/news_view/?famous-youtuber-james-freeman-promotes-prn&amp;id=3c5d8774-1ab1-44f0-992c-53f304b9010a&amp;pg=2</a>	2/16/2024	
G12	5/8/2023	LIVE: Entire Baby Cyrus Story Presentation - Diego will be doing LIVE Entire Baby Cyrus Story Presentation This Wednesday!	<a href="https://www.peoplesrights.org/news_view/?live-entire-baby-cyrus-story-presentation&amp;id=b1a16ea9-8ffa-4013-a219-226aa0a86160&amp;pg=2">https://www.peoplesrights.org/news_view/?live-entire-baby-cyrus-story-presentation&amp;id=b1a16ea9-8ffa-4013-a219-226aa0a86160&amp;pg=2</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view/?live-entire-baby-cyrus-story-presentation&amp;id=b1a16ea9-8ffa-4013-a219-226aa0a86160&amp;pg=2">https://www.peoplesrights.ws/news_view/?live-entire-baby-cyrus-story-presentation&amp;id=b1a16ea9-8ffa-4013-a219-226aa0a86160&amp;pg=2</a>	2/16/2024	A, B, K, M

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
G13	5/10/2023	Updates for St. Luke's abusive lawsuit against Ammon, Diego, People's Rights, etc. - Up to date information & court filings for St. Luke's abusive lawsuit against Ammon, Diego, PRN, etc.	<a href="https://www.peoplesrights.org/news_view?updates-for-st-luke-s-abusive-lawsuit-against-ammon-diego-people-s-rights-etc&amp;id=343c90a9-90ef-44a7-96c0-4d2cf40272fa&amp;pg=2">https://www.peoplesrights.org/news_view?updates-for-st-luke-s-abusive-lawsuit-against-ammon-diego-people-s-rights-etc&amp;id=343c90a9-90ef-44a7-96c0-4d2cf40272fa&amp;pg=2</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view?updates-for-st-luke-s-abusive-lawsuit-against-ammon-diego-people-s-rights-etc&amp;id=343c90a9-90ef-44a7-96c0-4d2cf40272fa&amp;pg=2">https://www.peoplesrights.ws/news_view?updates-for-st-luke-s-abusive-lawsuit-against-ammon-diego-people-s-rights-etc&amp;id=343c90a9-90ef-44a7-96c0-4d2cf40272fa&amp;pg=2</a>	2/16/2024	
G14	5/15/2023	Letter to Erik Stidham (St. Lukes Lead Attorney) from Ammon Bundy - If I do not have the right to publish and speak about what the evidence shows happened to baby Cyrus, then what right do I have to speak at all?	<a href="https://www.peoplesrights.org/news_view?letter-to-erik-stidham-st-lukes-lead-attorney-from-ammon-bundy&amp;id=3f51d298-daf4-4d77-b25e-9d78394dc5a1&amp;pg=2">https://www.peoplesrights.org/news_view?letter-to-erik-stidham-st-lukes-lead-attorney-from-ammon-bundy&amp;id=3f51d298-daf4-4d77-b25e-9d78394dc5a1&amp;pg=2</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view?letter-to-erik-stidham-st-lukes-lead-attorney-from-ammon-bundy&amp;id=3f51d298-daf4-4d77-b25e-9d78394dc5a1&amp;pg=2">https://www.peoplesrights.ws/news_view?letter-to-erik-stidham-st-lukes-lead-attorney-from-ammon-bundy&amp;id=3f51d298-daf4-4d77-b25e-9d78394dc5a1&amp;pg=2</a>	2/16/2024	J, N, O, P
G15	5/19/2023	Quick but Detailed Update Video on the Ammon Bundy/St. Lukes case - St. Lukes is pushing harder and harder to get their pound of flesh out of Ammon Bundy. See what is happening in this case.	<a href="https://www.peoplesrights.org/news_view?quick-but-detailed-update-video-on-the-ammon-bundy-st-lukes-case&amp;id=2b857012-3642-4ba5-8c7a-2711998a8275&amp;pg=2">https://www.peoplesrights.org/news_view?quick-but-detailed-update-video-on-the-ammon-bundy-st-lukes-case&amp;id=2b857012-3642-4ba5-8c7a-2711998a8275&amp;pg=2</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view?quick-but-detailed-update-video-on-the-ammon-bundy-st-lukes-case&amp;id=b857012-3642-4ba5-8c7a-2711998a8275&amp;pg=2">https://www.peoplesrights.ws/news_view?quick-but-detailed-update-video-on-the-ammon-bundy-st-lukes-case&amp;id=b857012-3642-4ba5-8c7a-2711998a8275&amp;pg=2</a>	2/16/2024	A, C, H, O, P, V
G16	7/9/2023	Letter to Judge Baskin from Ammon Bundy - You are now entering into the default judgment portion of this case. As the new presiding judge, you are now administering the process that will allow St. Luke's Executives to take everything I own, by force. This is not justice in any way and I will not allow my property to be taken by force as long as I am alive and free. God our Father will protect.	<a href="https://www.peoplesrights.org/news_view?letter-to-judge-baskin-from-ammon-bundy&amp;id=1d14827d-4757-4535-b18d-64ab170dcb19">https://www.peoplesrights.org/news_view?letter-to-judge-baskin-from-ammon-bundy&amp;id=1d14827d-4757-4535-b18d-64ab170dcb19</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view?letter-to-judge-baskin-from-ammon-bundy&amp;id=1d14827d-4757-4535-b18d-64ab170dcb19">https://www.peoplesrights.ws/news_view?letter-to-judge-baskin-from-ammon-bundy&amp;id=1d14827d-4757-4535-b18d-64ab170dcb19</a>	2/16/2024	A, B, C, E, G, J, K, O, P, T, U
G17	7/19/2023	St. Luke's Executives Still Offering Sex Change Surgeries on Children in Idaho - St. Luke's Children's Hospital webpage is still advertising minor hormone therapy and sex change surgeries. This video gives proof that they are still soliciting sex changes for minors in Idaho.	<a href="https://www.peoplesrights.org/news_view?st-lukes-executives-still-offering-sex-change-surgeries-on-children-in-idaho&amp;id=1398040c-bc59-4fcd-9bac-dcc1d6c72ac8">https://www.peoplesrights.org/news_view?st-lukes-executives-still-offering-sex-change-surgeries-on-children-in-idaho&amp;id=1398040c-bc59-4fcd-9bac-dcc1d6c72ac8</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view?st-lukes-executives-still-offering-sex-change-surgeries-on-children-in-idaho&amp;id=1398040c-bc59-4fcd-9bac-dcc1d6c72ac8">https://www.peoplesrights.ws/news_view?st-lukes-executives-still-offering-sex-change-surgeries-on-children-in-idaho&amp;id=1398040c-bc59-4fcd-9bac-dcc1d6c72ac8</a>	2/16/2024	A, C, F, J, L
G18	7/19/2023	St. Luke's Executives Still Offering Sex Change Surgeries on Children in Idaho	<a href="https://youtu.be/odjngCmla70">https://youtu.be/odjngCmla70</a>	10/18/2023	<a href="https://www.youtube.com/watch?v=odjngCmla70">https://www.youtube.com/watch?v=odjngCmla70</a>	2/16/2024	A, C, F, J, L
G19	8/7/2023	\$52 Million! No Wonder! They Lied to the Jury! - St. Lukes executives, lawyers & witnesses lied to the jury many times. Here is a few examples of them lying to the jury. No wonder the jury was so motivated to hang Diego & Ammon with \$52 Million. Idaho is not a place for lying doctors, lawyers, executives and reporters...go somewhere else to do your lying!	<a href="https://www.peoplesrights.org/news_view?52-million-no-wonder-they-lied-to-the-jury&amp;id=705912d3-d34c-4160-b11a-11e692e3ee19">https://www.peoplesrights.org/news_view?52-million-no-wonder-they-lied-to-the-jury&amp;id=705912d3-d34c-4160-b11a-11e692e3ee19</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view?52-million-no-wonder-they-lied-to-the-jury&amp;id=705912d3-d34c-4160-b11a-11e692e3ee19">https://www.peoplesrights.ws/news_view?52-million-no-wonder-they-lied-to-the-jury&amp;id=705912d3-d34c-4160-b11a-11e692e3ee19</a>	2/16/2024	H, I, O
G20	8/7/2023	\$52 Million! No Wonder! They Lied to the Jury!	<a href="https://youtu.be/eggqLhByTb0">https://youtu.be/eggqLhByTb0</a>	10/18/2023	<a href="https://www.youtube.com/watch?v=eggqLhByTb0">https://www.youtube.com/watch?v=eggqLhByTb0</a>	2/16/2024	H, I, O
G21	8/7/2023	Come No More Upon Me, A Warning Letter From, Ammon Bundy - Update 17 - To date, St Luke's team of attorneys have used the courts to put a lien on my home, forcing me to sell it. I have been forced to liquidate all my assets except a few and my family and I have no idea when any of this will end. St. Luke's CEO, Chris Roth, has given Holland & Hart a blank check to financially destroy Diego and I. Misusing the courts, they have put us under constant threat of losing everything we have worked for our entire lives.	<a href="https://www.peoplesrights.org/news_view?come-no-more-upon-me-a-warning-letter-from-ammon-bundy&amp;id=f6984a7c-eafc-4082-a3b4-e99dfe129733">https://www.peoplesrights.org/news_view?come-no-more-upon-me-a-warning-letter-from-ammon-bundy&amp;id=f6984a7c-eafc-4082-a3b4-e99dfe129733</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view?come-no-more-upon-me-a-warning-letter-from-ammon-bundy&amp;id=f6984a7c-eafc-4082-a3b4-e99dfe129733">https://www.peoplesrights.ws/news_view?come-no-more-upon-me-a-warning-letter-from-ammon-bundy&amp;id=f6984a7c-eafc-4082-a3b4-e99dfe129733</a>	2/16/2024	G, H, J, K, M, U
G22	8/28/2023	Recent Letter to Erik Stidham, Lead St. Luke's Attorney and Responses! - So what do I do? Do I flee Idaho with nothing? Do I grind through the legal process? Do I unite my neighbors, friends and family to physically defend against this terrible assault on liberty and the right to keep the fruits of my labor?	<a href="https://www.peoplesrights.org/news_view?recent-letter-to-erik-stidham-lead-st-lukes-attorney-and-responses&amp;id=8daa76ec-d798-4041-a893-2415f6e067c6">https://www.peoplesrights.org/news_view?recent-letter-to-erik-stidham-lead-st-lukes-attorney-and-responses&amp;id=8daa76ec-d798-4041-a893-2415f6e067c6</a>	10/18/2023	<a href="https://www.peoplesrights.ws/news_view?recent-letter-to-erik-stidham-lead-st-lukes-attorney-and-responses&amp;id=8daa76ec-d798-4041-a893-2415f6e067c6">https://www.peoplesrights.ws/news_view?recent-letter-to-erik-stidham-lead-st-lukes-attorney-and-responses&amp;id=8daa76ec-d798-4041-a893-2415f6e067c6</a>	2/16/2024	A, H, U
G23	8/31/2023	The Cost of Standing for a Baby - Update 25 The state taking children from parents is a serious matter. Should the courts be used to destitute a family for speaking against it? Here is what is happening to the Bundy family and why it is dangerous territory for all of us.			<a href="https://www.peoplesrights.ws/news_view?the-cost-of-standing-for-a-baby&amp;id=43ecaf2b-41d2-4c94-8f80-0793ef7ce319">https://www.peoplesrights.ws/news_view?the-cost-of-standing-for-a-baby&amp;id=43ecaf2b-41d2-4c94-8f80-0793ef7ce319</a>	2/21/2024	H, J, K, N, O
G24	11/28/2023	Come No More Upon Me, A Warning Letter From, Ammon Bundy - Update 18 - To date, St Luke's team of attorneys have used the courts to put a lien on my home, forcing me to sell it. I have been forced to liquidate all my assets except a few and my family and I have no idea when any of this will end. St. Luke's CEO, Chris Roth, has given Holland & Hart a blank check to financially destroy Diego and I. Misusing the courts, they have put us under constant threat of losing everything we have worked for our entire lives.			<a href="https://www.peoplesrights.ws/news_view?come-no-more-upon-me-a-warning-letter-from-ammon-bundy&amp;id=f6984a7c-eafc-4082-a3b4-e99dfe129733">https://www.peoplesrights.ws/news_view?come-no-more-upon-me-a-warning-letter-from-ammon-bundy&amp;id=f6984a7c-eafc-4082-a3b4-e99dfe129733</a>	3/8/2024	

Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source online	Active Date Checked	Defamation Category
G25	12/27/2023	The Legal Battle Against St. Lucifer's Hospital, Has Only Just Begun St. Lucifer's Hospital will find out that sowing lies and injustice to the Bundy family will reap justice and truth against them.			<a href="https://www.peoplesrights.ws/news_view/?the-legal-battle-against-st-lucifer-s-hospital-has-only-just-begun&amp;id=331bf032-7eff-4ec6-9b7e-9b1999767f57">https://www.peoplesrights.ws/news_view/?the-legal-battle-against-st-lucifer-s-hospital-has-only-just-begun&amp;id=331bf032-7eff-4ec6-9b7e-9b1999767f57</a>	3/8/2024	
G26	1/26/2024	UNDER ATTACK, the Peoples Rights System is Alive, Strong, and Well! The People's Rights System (the website) has been under fierce "legal" attack during the last few months by those who do not like their actions being brought into view of the public eye. However, the system is still alive, strong and well. Please use www.PeoplesRights.WS to access the site. Your login and the functionality is all still the same as it was before. Read below for the gory details.			<a href="https://www.peoplesrights.ws/news_view/?under-attack-the-peoples-rights-system-is-alive-strong-and-well&amp;id=eb1b3248-e7eb-4fc6-9bd0-86e52a925fee">https://www.peoplesrights.ws/news_view/?under-attack-the-peoples-rights-system-is-alive-strong-and-well&amp;id=eb1b3248-e7eb-4fc6-9bd0-86e52a925fee</a>	3/8/2024	

Exhibit	12/19/2023	File Name	Link to Source online	Active Date Checked	Link to Source Online	Active Date Checked	Defamation Category
H1	2/12/2023	What Will You Tolerate?	<a href="https://www.youtube.com/watch?v=LQyGyDdZn0">https://www.youtube.com/watch?v=LQyGyDdZn0</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=LQyGyDdZn0">https://www.youtube.com/watch?v=LQyGyDdZn0</a>	2/19/2024	A, B, K.
H2	4/19/2023	Baby Cyrus Was Kidnapped	<a href="https://www.youtube.com/watch?v=977A-BtUWVY">https://www.youtube.com/watch?v=977A-BtUWVY</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=977A-BtUWVY">https://www.youtube.com/watch?v=977A-BtUWVY</a>	2/19/2024	A, J, K.
H3	4/24/2023	Response	<a href="https://www.youtube.com/watch?v=N5lSgyuab4">https://www.youtube.com/watch?v=N5lSgyuab4</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=N5lSgyuab4">https://www.youtube.com/watch?v=N5lSgyuab4</a>	2/19/2024	
H4	4/30/2023	Give Me Liberty...	<a href="https://www.youtube.com/watch?v=y1TymZRqPMq">https://www.youtube.com/watch?v=y1TymZRqPMq</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=y1TymZRqPMq">https://www.youtube.com/watch?v=y1TymZRqPMq</a>	2/19/2024	
H5	5/25/2023	David Jeppesen Testifies Against Diego	<a href="https://www.youtube.com/watch?v=wMYmLRsn2h4">https://www.youtube.com/watch?v=wMYmLRsn2h4</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=wMYmLRsn2h4">https://www.youtube.com/watch?v=wMYmLRsn2h4</a>	2/19/2024	
H6	6/16/2023	Protect the Bundys and Stop Child Trafficking	<a href="https://www.youtube.com/watch?v=rAoHQ8_2Ec">https://www.youtube.com/watch?v=rAoHQ8_2Ec</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=rAoHQ8_2Ec">https://www.youtube.com/watch?v=rAoHQ8_2Ec</a>	2/19/2024	
H7	8/15/2023	Unwarranted Warrants	<a href="https://www.youtube.com/watch?v=VMX1Ga5k8Ss">https://www.youtube.com/watch?v=VMX1Ga5k8Ss</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=VMX1Ga5k8Ss">https://www.youtube.com/watch?v=VMX1Ga5k8Ss</a>	2/19/2024	B, I, K, N.
H8	9/6/2023	Jan Bennetts Why Not Prosecute Baby Cyrus Kidnappers?	<a href="https://www.youtube.com/watch?v=d47CJNkC6bQ">https://www.youtube.com/watch?v=d47CJNkC6bQ</a>	10/12/2023	<a href="https://www.youtube.com/watch?v=d47CJNkC6bQ">https://www.youtube.com/watch?v=d47CJNkC6bQ</a>	2/19/2024	
H9	9/7/2023	I'm Coming Out to Lynn Norton's Neighborhood!			<a href="https://www.youtube.com/watch?v=0bJktARMgKg">https://www.youtube.com/watch?v=0bJktARMgKg</a>	2/28/2024	
H10	11/9/2023	St Luke's v Bundys Nov 6th 2023			<a href="https://www.youtube.com/watch?v=Ob3A2uYOVhA">https://www.youtube.com/watch?v=Ob3A2uYOVhA</a>	3/1/2024	
H11	11/12/2023	St Lukes Hasn't Harassed the Bundy's			<a href="https://www.youtube.com/watch?v=kb7gVHCykMQ">https://www.youtube.com/watch?v=kb7gVHCykMQ</a>	3/1/2024	
H12	11/12/2023	Defamation- Harassment			<a href="https://www.youtube.com/watch?v=JqzCaBODpwc">https://www.youtube.com/watch?v=JqzCaBODpwc</a>	3/1/2024	
H13	11/13/2023	Defamation-Damages Trial Day 1			<a href="https://www.youtube.com/watch?v=UTkfJhEbmbl">https://www.youtube.com/watch?v=UTkfJhEbmbl</a>	3/1/2024	
H14	11/15/2023	Defamation-Damages Trial Day 2			<a href="https://www.youtube.com/watch?v=ZOKm2CFe0Ck">https://www.youtube.com/watch?v=ZOKm2CFe0Ck</a>	3/1/2024	
H15	11/15/2023	Defamation-Damages Trial Day 3			<a href="https://www.youtube.com/watch?v=qQFNvgIHbpE">https://www.youtube.com/watch?v=qQFNvgIHbpE</a>	3/1/2024	
H16	11/16/2023	Defamation-Damages Trial Day 4			<a href="https://www.youtube.com/watch?v=oAvnSTW_sM">https://www.youtube.com/watch?v=oAvnSTW_sM</a>	3/1/2024	
H17	11/16/2023	Defamation-Damages Trial Day 5			<a href="https://www.youtube.com/watch?v=xHXk6UOfAs8">https://www.youtube.com/watch?v=xHXk6UOfAs8</a>	3/1/2024	
H18	11/16/2023	Defamation-Damages Trial Day 6			<a href="https://www.youtube.com/watch?v=PPYrxbwXK9w">https://www.youtube.com/watch?v=PPYrxbwXK9w</a>	3/1/2024	
H19	11/16/2023	Defamation-Damages Trial Day 7			<a href="https://www.youtube.com/watch?v=PPYrxbwXK9w">https://www.youtube.com/watch?v=PPYrxbwXK9w</a>	3/1/2024	
H20	11/16/2023	Defamation-Damages Trial Day 8			<a href="https://www.youtube.com/watch?v=ZpGIE92L2Hs">https://www.youtube.com/watch?v=ZpGIE92L2Hs</a>	3/1/2024	
H21	11/18/2023	Defamation-Chris Roth CEO Full Testimony			<a href="https://www.youtube.com/watch?v=yqZdK7JNBZM">https://www.youtube.com/watch?v=yqZdK7JNBZM</a>	3/1/2024	
H22	11/24/2023	"Had To" Says the Pretty Puppet			<a href="https://www.youtube.com/watch?v=Aw9TJSuH8mg">https://www.youtube.com/watch?v=Aw9TJSuH8mg</a>	3/1/2024	
H23	11/24/2023	"On the Verge of Organ Failure!" Says Stidham			<a href="https://www.youtube.com/watch?v=gKznXabbqXw">https://www.youtube.com/watch?v=gKznXabbqXw</a>	3/1/2024	
H24	11/25/2023	Defamation and Violent Confrontations			<a href="https://www.youtube.com/watch?v=wjvxHtVw0cU">https://www.youtube.com/watch?v=wjvxHtVw0cU</a>	3/1/2024	
H25	11/25/2023	"He Shut Down an Ambulance Bay" Stidham Lies			<a href="https://www.youtube.com/watch?v=wCEe34gu810">https://www.youtube.com/watch?v=wCEe34gu810</a>	3/1/2024	
H26	11/28/2023	Defamation, Not Medically Necessary			<a href="https://www.youtube.com/watch?v=k2mYvA5Orfs">https://www.youtube.com/watch?v=k2mYvA5Orfs</a>	3/1/2024	
H27	11/28/2023	McGilvery Loves St. Luke's			<a href="https://www.youtube.com/watch?v=4JYfb-mmCXg">https://www.youtube.com/watch?v=4JYfb-mmCXg</a>	3/1/2024	
H28	12/2/2023	Defamation-Tracy Jungman NP Full Testimony			<a href="https://www.youtube.com/watch?v=H_nyWgr6WoM">https://www.youtube.com/watch?v=H_nyWgr6WoM</a>	3/1/2024	
H29	12/3/2023	CPS-The Trafficking Operation			<a href="https://www.youtube.com/watch?v=IGtjyGx01qE">https://www.youtube.com/watch?v=IGtjyGx01qE</a>	3/1/2024	
H30	12/11/2023	Tracy Jungman-Violence and Extremism False Testimony			<a href="https://www.youtube.com/watch?v=hQHqX6ZMWs">https://www.youtube.com/watch?v=hQHqX6ZMWs</a>	3/1/2024	
H31	12/11/2023	Tracy Jungman-Polical Extremism, Ammon's Message			<a href="https://www.youtube.com/watch?v=X2VZ1wFHOD8">https://www.youtube.com/watch?v=X2VZ1wFHOD8</a>	3/1/2024	
H32	12/11/2023	Psychotic Tracy Jungman, Coercion is Not Consent!			<a href="https://www.youtube.com/watch?v=zeUDqL9WLvk">https://www.youtube.com/watch?v=zeUDqL9WLvk</a>	3/1/2024	
H33	12/11/2023	Tracy Jungman's Forced Consent			<a href="https://www.youtube.com/watch?v=yyd7CyToH_s">https://www.youtube.com/watch?v=yyd7CyToH_s</a>	3/1/2024	
H34	12/11/2023	Tracy Jungman-Secret Nurse Combination			<a href="https://www.youtube.com/watch?v=0gzk15X7E3A">https://www.youtube.com/watch?v=0gzk15X7E3A</a>	3/1/2024	
H35	12/11/2023	Financial Incentives for CPS and Medical Kidnap and Child Trafficking			<a href="https://www.youtube.com/watch?v=rOIFWqD0f5c">https://www.youtube.com/watch?v=rOIFWqD0f5c</a>	3/1/2024	
H36	12/16/2023	ABCs of Tyranny!			<a href="https://www.youtube.com/watch?v=ek04sZAYhOA">https://www.youtube.com/watch?v=ek04sZAYhOA</a>	3/1/2024	
H37	12/19/2023	Tracy Jungman Says She Yelled at Her Son			<a href="https://www.youtube.com/watch?v=fp5tDrCPbm4">https://www.youtube.com/watch?v=fp5tDrCPbm4</a>	3/1/2024	
H38	12/28/2023	Tracy Jungman-Child Trafficker of the Year Award			<a href="https://www.youtube.com/watch?v=lrGezQ62ZDQ">https://www.youtube.com/watch?v=lrGezQ62ZDQ</a>	3/1/2024	
H39	12/30/2023	Ada County Kidnap Crime Conspiracy Cover-up!			<a href="https://www.youtube.com/watch?v=LT7zmdTE7bo">https://www.youtube.com/watch?v=LT7zmdTE7bo</a>	3/1/2024	
H40	1/1/2024	Holland and Hart File Processor			<a href="https://www.youtube.com/watch?v=KSuGZqVr-LU">https://www.youtube.com/watch?v=KSuGZqVr-LU</a>	3/1/2024	
H41	2/17/2024	Robbery and Human Trafficking is the Law in Idaho			<a href="https://www.youtube.com/watch?v=TkQ2EZnNfyQ">https://www.youtube.com/watch?v=TkQ2EZnNfyQ</a>	3/1/2024	



Exhibit	Date of Item	File Name	Link to Source online	Active Date Checked	Link to Source Online	Active Date Checked	Defamation Category
I1	3/12/2022	Press Release: Baby Cyrus Kidnapped (PR Relates to Ammon Bundy Arrest)	<a href="https://idahodispatch.com/press-release-baby-cyrus-kidnapped-pr-relates-to-ammon-bundy-arrest/">https://idahodispatch.com/press-release-baby-cyrus-kidnapped-pr-relates-to-ammon-bundy-arrest/</a>	10/13/2023	<a href="https://idahodispatch.com/press-release-baby-cyrus-kidnapped-pr-relates-to-ammon-bundy-arrest/">https://idahodispatch.com/press-release-baby-cyrus-kidnapped-pr-relates-to-ammon-bundy-arrest/</a>	2/19/2024	A, J
I2	3/12/2022	Press Release: Statement on Ammon Bundy's Arrest in Meridian	<a href="https://idahodispatch.com/press-release-statement-on-ammon-bundys-arrest-in-meridian/">https://idahodispatch.com/press-release-statement-on-ammon-bundys-arrest-in-meridian/</a>	10/13/2023	<a href="https://idahodispatch.com/press-release-statement-on-ammon-bundys-arrest-in-meridian/">https://idahodispatch.com/press-release-statement-on-ammon-bundys-arrest-in-meridian/</a>	2/19/2024	A, J
I3	12/28/2022	Idaho Dispatch interviews the Idaho man we can't name here on this platform. The rest of the interview will be found on other platforms we will mention in the comments.	<a href="https://www.facebook.com/watch/live/?ref=search&amp;v=958123531819046">https://www.facebook.com/watch/live/?ref=search&amp;v=958123531819046</a>		<a href="https://www.facebook.com/idahodispatch/videos/958123531819046/">https://www.facebook.com/idahodispatch/videos/958123531819046/</a>	2/19/2024	
I4	12/28/2022	Transcript of Idaho Dispatch interviews the Idaho man we can't name on this platform.		10/13/2023			
I5	12/28/2022	Idaho Dispatch interviews the Idaho man we can't name here on this platform. The rest of the interview will be found on other platforms we will mention in the comments. Part 2	<a href="https://www.facebook.com/idahodispatch/videos/958123531819046">https://www.facebook.com/idahodispatch/videos/958123531819046</a>	10/13/2023	<a href="https://www.facebook.com/idahodispatch/videos/958123531819046">https://www.facebook.com/idahodispatch/videos/958123531819046</a>	2/19/2024	
I6	1/18/2023	Op-Ed: Come No More Upon Me, a Warning Letter from Ammon Bundy	<a href="https://idahodispatch.com/op-ed-come-no-more-upon-me-a-warning-letter-from-ammon-bundy/">https://idahodispatch.com/op-ed-come-no-more-upon-me-a-warning-letter-from-ammon-bundy/</a>	10/13/2023	<a href="https://idahodispatch.com/op-ed-come-no-more-upon-me-a-warning-letter-from-ammon-bundy/">https://idahodispatch.com/op-ed-come-no-more-upon-me-a-warning-letter-from-ammon-bundy/</a>	2/19/2024	
I7	2/1/2023	Op-Ed: There is No Silver Bullet to Securing Liberty	<a href="https://idahodispatch.com/op-ed-there-is-no-silver-bullet-to-securing-liberty/">https://idahodispatch.com/op-ed-there-is-no-silver-bullet-to-securing-liberty/</a>	10/13/2023	<a href="https://idahodispatch.com/op-ed-there-is-no-silver-bullet-to-securing-liberty/">https://idahodispatch.com/op-ed-there-is-no-silver-bullet-to-securing-liberty/</a>	2/19/2024	
I8				10/13/2023	VIDEO		
I9	5/21/2023	Lisa Bundy responds to typical MSM talking points.	<a href="https://rumble.com/v2p5vc4-lisa-bundy-responds-to-typical-msm-talking-points.html">https://rumble.com/v2p5vc4-lisa-bundy-responds-to-typical-msm-talking-points.html</a>	10/13/2023	<a href="https://rumble.com/v2p5vc4-lisa-bundy-responds-to-typical-msm-talking-points.html">https://rumble.com/v2p5vc4-lisa-bundy-responds-to-typical-msm-talking-points.html</a>	2/19/2024	
I10	5/9/2023	When will you put a stop to free speech? This American First Amendment is causing problems for corruption. @StLukesHealth @HollandHart @dburghart @BoisePD #Idpol #BBQS	<a href="https://twitter.com/DavidPettinger/status/1656154718912270336">https://twitter.com/DavidPettinger/status/1656154718912270336</a>	10/13/2023	<a href="https://twitter.com/DavidPettinger/status/1656154718912270336">https://twitter.com/DavidPettinger/status/1656154718912270336</a>	2/19/2024	
I11	5/23/2023	Moments ago, Fourth District Ada County Judge Lynn Norton issued an arrest warrant for Diego Rodriguez in the lawsuit involving St. Luke's hospital and Ammon Bundy. Idaho Dispatch will have additional information coming soon.			<a href="https://www.facebook.com/photo/?fbid=624441469705135&amp;set=a.222917299857556">https://www.facebook.com/photo/?fbid=624441469705135&amp;set=a.222917299857556</a>	3/8/2024	
I12	5/24/2023	Rodriguez Files Notice of Removal to Federal Court in St. Luke's Lawsuit			<a href="https://idahodispatch.com/rodriguez-files-notice-of-removal-to-federal-court-in-st-lukes-lawsuit/">https://idahodispatch.com/rodriguez-files-notice-of-removal-to-federal-court-in-st-lukes-lawsuit/</a>	3/8/2024	
I13	6/6/2023	Federal Court Dismisses Rodriguez Complaint as Moot, State Court Issues Second Arrest Warrant			<a href="https://idahodispatch.com/federal-court-dismisses-rodriguez-complaint-as-moot-state-court-issues-second-arrest-warrant/">https://idahodispatch.com/federal-court-dismisses-rodriguez-complaint-as-moot-state-court-issues-second-arrest-warrant/</a>	3/8/2024	
I14	7/11/2023	In the Ada County Courthouse for St. Luke's vs. Ammon Bundy & Diego Rodriguez. Erik Stidham, counsel for St. Luke's, in opening statements to the jury claimed "Ammon Bundy and Diego Rodriguez are cowards for not being here."			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/8/2024	
I15	7/11/2023	Erik Stidham released name of infant Cyrus during an expert slide of Dr. Wheaton. He claimed he would keep the identity of the baby confidential during opening statements to the jury.			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/8/2024	
I16	7/11/2023	Chris Roth, CEO of St. Luke's, Devin Burghart, Executive Director Institute Research Education Human Rights (IREHR), Dave Jeppesen, Director Idaho Department Health and Welfare, to testify this afternoon.			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/8/2024	
I17	7/11/2023	Judge Nancy Baskin stops Chris Roth's testimony two times for hearsay. She directs Erik Stidham in his client's testimony.			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/8/2024	
I18	7/11/2023	"I felt like we were going to be under attack" Chris Roth			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/8/2024	
I19	7/12/2023	During Chris Roth's testimony yesterday it was revealed that St. Luke's Threat Assessment Team asked for local F.B.I field office to monitor for posts relating to child's care team. Idaho Criminal Intelligence Center and Saint Luke's Health System Cyber Security also monitored doxxing.			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/8/2024	
I20	7/12/2023	During trial yesterday in the St. Luke's vs. Ammon Bundy and Diego Rodriguez case, one of St. Luke's hired experts formerly of Center For New Community in Chicago made this claim. Devin Burghart, Director of Institute Research Education Human Rights (IREHR), testified that People's Rights Network is at the top of the list for their Threat Matrix.			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
I21	7/13/2023	Dave Jeppesen, Director IDHW, during testimony in the St. Luke's vs. Ammon Bundy and Diego Rodriguez case claimed his agencies support for Pride events is for "public health."			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	

122	7/13/2023	Stew Peters quote from Baby Cyrus Official Telegram Channel presented in St. Luke's vs. Ammon Bundy and Diego Rodriguez today. "This is war, and I'm not sitting in some foxhole somewhere waiting to be destroyed. I'm throwing the bayonets on and running at these satanic, killer communist leftists and RINO losers. Who's with me? LET'S GO!"		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
123	7/13/2023	Dave Jeppesen, Director of IDHW, testified today in the St. Luke's vs. Ammon Bundy and Diego Rodriguez case that Child Protective Services (CPS) in 2022 received 23,300 referrals 9,300 screened in 1,213 removed from home "came into care." 62% return home to biological parents.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
124	7/13/2023	Dave Jeppesen, Director of IDHW, testified today in the St. Luke's vs. Ammon Bundy and Diego Rodriguez case that he has cancelled parental rights for 1,400 children since 2019 and signed their adoption papers.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
125	7/14/2023	Will Woods, St. Luke's Meridian Security Officer claimed in testimony that the individuals who accompanied Ammon Bundy the night of Baby Cyrus being taken to the hospital, "scattered like cockroaches" after Bundy being trespassed.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
126	7/14/2023	Judge Nancy Baskin admonishes Erik Stidham, Partner at Holland and Hart, for calling Ammon Bundy and Diego Rodriguez "cowards" in front of the jury during questioning Dr. Rachel Thomas. Baskin tells Stidham for the second day in a row to follow the rules of evidence and again voices her concern regarding hearsay. She also explains that repeating the answers of questions is slowing down the trial.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
127	7/14/2023	In the case of St. Luke's vs. Ammon Bundy and Diego Rodriguez, Judge Nancy Baskin has struck the female juror that became ill yesterday. Jury now consists of 12 jurors and two alternates.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
128	7/14/2023	Officer McGilvery, Meridian Police Department, claimed in testimony today that Ammon Bundy while at the ambulance bay at St. Luke's Meridian was "happy to be arrested, those were his intentions of coming there."		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
129	7/14/2023	Judge Nancy Baskin, commenting on the quantity of exhibits presented by Holland and Hart in the St. Luke's vs. Ammon Bundy and Diego Rodriguez case, "overwhelming to the court, let alone the jurors."		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
130	7/15/2023	St. Luke's has hired a team from Holland and Hart. Six to eight attorneys present all week long. Attorneys often are paid by the hour. The longer each witness is on the stand the more money the firm makes.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
131	7/16/2023	Holland and Hart has not yet called Mr. Fomby to take the stand in the St. Luke's vs. Ammon Bundy and Diego Rodriguez trial.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
132	7/17/2023	During the St. Luke's vs. Ammon Bundy and Diego Rodriguez case this morning, Dr. James Souza, Chief Physician Executive, testified that "Absence of family is a direct threat to patient safety."		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
133	7/18/2023	In the St. Luke's vs. Ammon Bundy and Diego Rodriguez case, Mr. Abbondandolo, Senior Director of Security at St. Luke's testified, "I was surprised a group could function that quickly." Testimony in reference to People's Rights organizing a protest outside St. Luke's the morning after Baby Cyrus was taken by CPS.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
134	7/18/2023	In the St. Luke's vs. Ammon Bundy and Diego Rodriguez case, Mr. Abbondandolo, Senior Director of Security at St. Luke's testified in reference to the social media postings surrounding Baby Cyrus, it was similar to "What we would see in domestic terrorism." He then mentioned his experience in Texas with the Branch Davidians		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
135	7/18/2023	In the St. Luke's vs. Ammon Bundy and Diego Rodriguez case, medical expert Dr. Wheaton of St. AI's Pediatrics testified, "The parents were responsible for the worsening health of the infant after the initial hospitalization. Specifically, the parents were medically neglectful with following the recommendations for feeding their infant."		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
136	7/18/2023	Dr. Camille LaCroix, St. Luke's forensic psychiatry expert has diagnosed Dr. Natasha Erickson and Nurse Practitioner Tracy Jungman with PTSD and Acute Stress Disorder from the events surrounding the Baby Cyrus CPS case.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	

137	7/20/2023	Beth Toal, V.P. of Communications and Marketing for St. Luke's Health System testified today that Ammon Bundy and Diego Rodriguez used social media as a "Deliberate, strategic, corporate level attack." "Their weapon was social media." "Sophisticated." "Nature of threat was something we had never experienced before."		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
138	7/20/2023	Jessica Flynn, CEO of Red Sky, expert witness for St. Luke's on public relations and marketing testified today in the defamation case against Ammon Bundy and Diego Rodriguez that "Idaho Dispatch is a small extremist outlet based in Idaho."		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
139	7/20/2023	"Disinformation campaign, intentional intent to deceive." Jessica Flynn, CEO of Red Sky, expert witness for St. Luke's on public relations and marketing testified today in the defamation case against Ammon Bundy and Diego Rodriguez. CISA, SPLC, IREHR were referenced to come to this conclusion.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
140	7/20/2023	"\$23,171,917 Advertising Value Equivalency, 2.51 billion eyeballs" value and reach of media campaign in regards to Baby Cyrus. Jessica Flynn, CEO of Red Sky, expert witness for St. Luke's on public relations and marketing testified today in the defamation case against Ammon Bundy and Diego Rodriguez. "\$16,775,054 Reputation Campaign: St. Luke's," cost to repair defamation damages.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
141	7/20/2023	Spencer Fomby, Howard University Washington D.C., Berkeley P.D. 20 years, St. Luke's expert on extremism testified today "Ammon Bundy's PRN is an extremist group with a documented history of threatening and violent behavior." "Use typical extremist playbook."		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
142	7/20/2023	Spencer Fomby, Howard University Washington D.C., Berkeley P.D. 20 years, St. Luke's expert on extremism testified today "The disruption of March 15, 2022 posed a serious risk of violence, not a protest." "The misinformation has recently taken on accusations of genital mutilation."		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
143	7/20/2023	"The systematic doxing and harassment of Chris Roth, Dr. Natasha Erickson, Tracy Jungman and St. Luke's was intended to intimidate and terrorize the plaintiffs." Spencer Fomby, Howard University Washington D.C., Berkeley P.D. 20 years, St. Luke's expert on extremism testified today in the defamation case against Ammon Bundy and Diego Rodriguez.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
144	7/21/2023	"Examples of Radicalization Robert Jones violent extremist, NATO Pyramid Model Bundy made Jones a hero within PRN for his jail time. Carrying it open in a holster, it is meant to intimidate people." Spencer Fomby, Howard University Washington D.C., Berkeley P.D. 20 years, St. Luke's expert on extremism testified today in the defamation case against Ammon Bundy and Diego Rodriguez.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
145	7/21/2023	Dennis Reinstein CPA, St. Luke's finance expert testified today "Present value of losses and costs \$49,399,123" to St. Luke's Health Systems as a result of Ammon Bundy and Diego Rodriguez actions.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
146	7/21/2023	Dennis Reinstein CPA, St. Luke's finance expert testified today in the costs of new security personnel and equipment. "Total annual impact \$4,630,203 Tasers, Reflex Protect Spray Gel, Body Camera, Bullet Proof Vest, Drone Patrol Program" to St. Luke's Health Systems as a result of Ammon Bundy and Diego Rodriguez actions.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
147	7/21/2023	St. Luke's rests its case against Ammon Bundy and Diego Rodriguez. Holland and Hart prepares for closing arguments at 2:30 P.M. today, Ada County Courthouse Room 400.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
148	7/21/2023	Judge Nancy Baskin releases two alternate jurors from the courthouse in the St. Luke's vs Ammon Bundy and Diego Rodriguez case. Two females released. Jury is now in deliberation.		<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
149	7/22/2023	St. Luke's Hospital Lawsuit Against Ammon Bundy and Diego Rodriguez Now in the Hands of Ada County Jury		<a href="https://idahodispatch.com/st-lukes-hospital-lawsuit-against-ammon-bundy-and-diego-rodriguez-now-in-the-hands-of-ada-county-jury/">https://idahodispatch.com/st-lukes-hospital-lawsuit-against-ammon-bundy-and-diego-rodriguez-now-in-the-hands-of-ada-county-jury/</a>	3/26/2024	

I50	7/24/2023	Judge Nancy Baskin addressed St. Luke's counsel Holland and Hart this morning regarding injunctive relief. "Appreciate some assist on the case law." Jury is back in deliberation with a new laptop to view the evidence submitted by the plaintiffs in the damages case against Ammon Bundy and Diego Rodriguez.			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
I51	7/24/2023	The jury has spent the entire day deliberating St. Luke's vs. Ammon Bundy and Diego Rodriguez.			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
I52	7/25/2023	Ammon Bundy responds to jury awarding millions in damages to St. Luke's. "Massive institutions combined with the state, financially benefiting when they take a child is one of the worst combination a parent can imagine."			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
I53	7/28/2023	Jury Awards \$52.5M to St. Luke's in Defamation Case Re: Baby Cyrus			<a href="https://idahodispatch.com/jury-awards-52-5m-to-st-lukes-in-defamation-case-re-baby-cyrus/">https://idahodispatch.com/jury-awards-52-5m-to-st-lukes-in-defamation-case-re-baby-cyrus/</a>	3/26/2024	
I54	7/28/2023	Breaking: Diego Rodriguez Argues First Amendment Rights and Whistleblower Protection in New Court Filing			<a href="https://idahodispatch.com/breaking-diego-rodriguez-argues-first-amendment-rights-and-whistleblower-protection-in-new-court-filing/">https://idahodispatch.com/breaking-diego-rodriguez-argues-first-amendment-rights-and-whistleblower-protection-in-new-court-filing/</a>	3/26/2024	
I55	8/2/2023	Editorial: Idaho Dispatch Responds to Being Labeled "Extreme" in a Recent Ada County Trial			<a href="https://idahodispatch.com/editorial-idaho-dispatch-responds-to-being-labeled-extreme-in-a-recent-ada-county-trial/">https://idahodispatch.com/editorial-idaho-dispatch-responds-to-being-labeled-extreme-in-a-recent-ada-county-trial/</a>	3/26/2024	
I56	8/11/2023	Breaking News: Ammon Bundy Arrested on Contempt of Court Warrant			<a href="https://idahodispatch.com/breaking-news-ammon-bundy-arrested-on-contempt-of-court-warrant/">https://idahodispatch.com/breaking-news-ammon-bundy-arrested-on-contempt-of-court-warrant/</a>	3/26/2024	
I57	8/13/2023	Ammon Bundy Out of Jail, Hearing Scheduled in Third District Court Monday Afternoon			<a href="https://idahodispatch.com/ammon-bundy-out-of-jail-hearing-scheduled-in-third-district-court-monday-afternoon/">https://idahodispatch.com/ammon-bundy-out-of-jail-hearing-scheduled-in-third-district-court-monday-afternoon/</a>	3/26/2024	
I58	8/17/2023	Op-Ed: Ammon Bundy Trial and Its Message to the Public			<a href="https://idahodispatch.com/op-ed-ammon-bundy-trial-and-its-message-to-the-public/">https://idahodispatch.com/op-ed-ammon-bundy-trial-and-its-message-to-the-public/</a>	3/26/2024	
I59	8/28/2023	Will Holland and Hart be granted injunctive relief for their client, St. Luke's? Governor Little appointee Brent Whiting presiding. We will update social media after the 1 P.M. hearing.			<a href="https://www.facebook.com/idahodispatch">https://www.facebook.com/idahodispatch</a>	3/26/2024	
I60	11/13/2023	Arrest Warrant Issued for Ammon Bundy Following His Absence on First Day of New Trial in Ada County			<a href="https://idahodispatch.com/arrest-warrant-issued-for-ammon-bundy-following-his-absence-on-first-day-of-new-trial-in-ada-county/">https://idahodispatch.com/arrest-warrant-issued-for-ammon-bundy-following-his-absence-on-first-day-of-new-trial-in-ada-county/</a>	3/26/2024	
I61	11/17/2023	Ammon Bundy Arrest Warrant Inspection Denied by Judge Baskin			<a href="https://idahodispatch.com/ammon-bundy-arrest-warrant-inspection-denied-by-judge-baskin/">https://idahodispatch.com/ammon-bundy-arrest-warrant-inspection-denied-by-judge-baskin/</a>	3/26/2024	



The Order of the Court is stated below:

Dated: April 22, 2024  
04:58:37 PM

At the direction of:  
ERIC A LUDLOW  
District Court Judge

by

/s/ SHAWNA YOUNG  
District Court Clerk

Darren G. Reid (11163)  
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*Attorneys for Plaintiffs and Judgment Creditors*

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**IN THE FIFTH JUDICIAL DISTRICT COURT  
IN AND FOR WASHINGTON COUNTY, STATE OF UTAH**

<p>ST. LUKE'S HEALTH SYSTEM, LTD.; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD.; CHRIS ROTH; NATASHA ERICKSON, M.D.; and TRACY JUNGMAN, N.P.;</p> <p>Plaintiffs and Judgment Creditors,</p> <p>v.</p> <p>Ammon Bundy, an individual; Ammon Bundy for Governor, a political organization; Diego Rodriguez, an individual; Freedom man Press LLC, a limited liability company; Freedom man PAC, a registered political action committee; and People's Rights network, a political organization and an unincorporated association;</p> <p>Defendants and Judgment Debtors.</p>	<p><b>ORDER TO ATTEND HEARING</b></p> <p>Case No. 246501034</p> <p>Judge Eric A. Ludlow</p>
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Having reviewed the Ex Parte Motion to Enforce Order and for Sanctions (the "Motion"),  
and for good cause otherwise appearing, the Court hereby ORDERS the following:

1. On August 29, 2023, Plaintiffs obtained a judgment against Defendants in Idaho state Court (the “Judgment”) as set forth in the Notice of Filing of Foreign Judgment filed with this Court on April 15, 2024.
2. Plaintiffs seek the following relief from the Court: that the Court hold Defendants in contempt of court and order that: (a) Defendants are fined \$1,000; (b) Defendants pay Plaintiffs’ reasonable costs, expenses, and attorneys’ fees caused by the violations of the Judgment and for bringing the motion to enforce; and (c) Defendants be required to appear personally at this Court (on a certain date to be scheduled) to determine whether they have violated the Judgment.
3. Defendants are required to appear personally at Fifth District Court, Washington County, 206 West Tabernacle, Suite 2A, St. George, Utah, 84770 on the following date and time Thursday, May 16, 2024 at 9:00 am. to explain whether Defendants have violated the Judgment.
4. No written response to Plaintiffs’ Motion is required but is permitted if filed within 14 days of service of this Order to Attend Hearing unless the Court Sets a different time. Any response must follow the requirements of Rule 7 of the Utah Rules of Civil Procedure.

**SO ORDERED.**

**In accordance with Utah R. Civ. P. 10(e) and Utah State District Courts Efiling Standard No. 4, this Order does not bear the handwritten signature of the Court, but instead displays an electronic signature at the top of the first page of this Order.**